

## Appendix C (1): Residents Schedule of Respondents and Comments on Residential CIL Rates

ID	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/1</a>	Mr Chris Carter		i strongly appose development of any type in billericay especially resedential built on green belt land there has been no thought about infrastructure and the adverse effect these badly thought out plans will have to all the resedents of billericay
<a href="#">PDCS/2</a>	Mr Neil Stanley		
<a href="#">PDCS/3</a>	Mr James Moran		These proposals are simply ridiculous. They assume that people who own their own home and are looking to develop it are wealthy and can afford a further 'tax', when in many cases this couldn't be further from the truth. Some people can only afford a small home and have to develop it when their families expand - and to propose 'taxing' people for this is a joke. Private home owners are already penalised at the expense of public funded homes and this proposal is making it even worse. These proposals ultimately make it unattractive for people to aspire to own their own home and develop it - you are making it more attractive for people to rely on the benefit state. If you want to fund infrastructure spending, instead of 'taxing' home owners and aspiring entrepreneurs even more than you do already, how about cutting some red tape and cutting the costs associated with running the council, such as the inflated headcount.
<a href="#">PDCS/4</a>	Mr John Haverty		Would you confirm that this is for new developments only and not for existing residential properties
<a href="#">PDCS/5</a>	Mr Paul Broadfield		This whole area is overcrowded with inadequate roads, insufficient car parks, overcrowded schools and doctors. Infrastructure needs MAJOR investment and not the minimal sums these charges are going to generate.
<a href="#">PDCS/6</a>	Captain Beverley Beale		
<a href="#">PDCS/7</a>	Mrs Margaret Beale		
<a href="#">PDCS/8</a>	Mr Matthew Eva		Rates should be the same across the district. The proposal to have higher rates in Billericay could be seen as a deterrent to develop in Billericay
<a href="#">PDCS/9</a>	Mr Philip Woods		

ID	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/10</a>	Ms christine wade		Payment for infrastructure is vital however the rates for Wickford and Billericay will mean that there is unlikely to be any affordable housing. The Billericay rate is higher than most London boroughs and much higher than the proposal for Brentwood of £200. If there are higher rates then the Infrastructure should reflect this extra Levy.
<a href="#">PDCS/11</a>	Mr Phillip Davison		
<a href="#">PDCS/12</a>	Ms Sylvina Tate		
<a href="#">PDCS/13</a>	Mr Andrew Wade		
<a href="#">PDCS/14</a>	Mr Leo Defoe		The Draft Schedule is weighted in favour of building in Basildon with prospective developers incurring a greatly reduced rate compared to that charged for developing in Wickford and Billericay, consequently this would lead to greater pressure on Basildon's infrastructure for which the developers would pay only a nominal sum to finance any improvements. I would wish to see the same Rate applied across the Borough
<a href="#">PDCS/15</a>	Mr MD Stanford		I do not agree with different rates being charged within the different parts of the Borough being fair. If anything the rates in Basildon should be higher because more money is spent on Basildon than it is in Billericay. Billericay does not have an Olympic sized swimming pool, actually Billericay doesn't even have a swimming pool, Basildon has leisure centres, colleges and have recently had a large amount of money spent on their town centre. Billericay doesn't even have a police station, or hospital. So why should Billericay rates be so high, it only encourages the local council to dump more houses in Billericay than Billericay actually needs, just they can make more money to improve Basildon further.
<a href="#">PDCS/17</a>	Mr David Threadgold		I have estimated this would add £40,000 cost to build my house in Billericay. This would be paid by the consumer not the builder. Why are we adding cost to house prices at a time of so called national shortage? If no charge is appropriate for the "public authority" then it should be applied to all housing developments across the Borough.

ID	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/18</a>	Mrs Jenni Hamilton-Morris		<p>Whilst I appreciate that different towns within the borough have different valued properties, and therefore different levels of affordability, to introduce a tax that differs so wildly will just put some towns out of reach for first time buyers. To only charge £50 in Basildon, but 7 times that amount in Billericay is massively skewed and totally inappropriate. £350 per square metre puts Billericay on a par with some areas in London and almost twice the rate proposed for Brentwood (£200 per square metre), which is a very similar town economically and residentially. People generally don't mind paying if they feel the amount is fair and the money will go into improving their local area - the amount proposed for Billericay is not fair (in relation to the rest of the borough) and the concern is that the money will just disappear into the council's coffers and not be spent in Billericay where it is needed to sort out numerous potholes/road surfaces and improve street lighting (to name a couple of issues).</p>
<a href="#">PDCS/19</a>	Mrs Jean Carter		<p>Unless the amounts raised in the various areas is to be ringfenced for those areas then the CIL should be the same for all residential development , the rate for Wickford would seem reasonable for the whole district. The need for additional infrastructure will be spread across the whole district so it is unreasonable that Billericay pay more than it's fair share unless the money raised is kept in the town. Our road network in particular is not fit for purpose with significant housing development as all roads running north to south need to cross old railway bridges not built for modern traffic where as Basildon was built as a new town with a dual carriageway network . Billericay is already short of parking which the council has recognised in its Parking Capacity and Intervention Study May 2017. THis problem will be made worse by new development and must be addressed for the town centre to thrive as if people cannot park they will go elsewhere. The town already has a shortage of primary school places and lost a local GP last year who was not replaced forcing his patients to register with other GPs in the town adding to the pressures they already faced. The CIL charged will ultimately be paid by the purchaser of the new property which will add a very significant cost to properties in Billericay, likely to be £35,000 on a family home. What Billericay needs is affordable housing for our young people who cannot currently afford to buy in the town. The cheapest, one bed property is currently £200,000 + which is outside the range of most first time buyers. Even if the developers can be persuaded to offer small properties for purchase or rent the CIL of £350 per square metre will increase the cost of the properties making them more expensive than a similar property in other parts of the district. This is not fair on our young people. Given the need for significant improvements to the infrastructure in Billericay it is unreasonable to expect developers (ultimately the purchasers) to have to pay more than elsewhere in the district <u>unless</u> it is guaranteed and publicly proven that the amount raised in Billericay is ringfenced for spending in Billericay.</p>

ID	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/20</a>	Trisch Knight		<p>It is not appropriate for there to be vastly different charges in the various towns of the Borough. Brentwood, I understand, is applying a standard rate of £200 in all areas with the logic that infrastructure costs will be essentially the same wherever they are built within the Borough. There is also no requirement for the CIL to be spent where it has been collected, so the Billericay money could end up funding improvements elsewhere in the Borough. In addition, there is the potential for even more houses to be approved for building in Billericay in the future as the Council will clearly get 7 times as much money for a house in Billericay compared to one in Basildon - this is not equitable. It could also mean that to recover the cost, developers will tend to build executive style properties that are more expensive resulting in fewer smaller affordable homes for the younger generation to purchase.</p>
<a href="#">PDCS/22</a>	Mrs Susan Tomlinson		<p>I can see no justification for such wide variation in the CIL rate for different parts of the borough. It will increase the social and economic divide in the borough when the council should encourage a social and economic mix. It is important that gardeners and cleaners and social care workers should be able to live near their clients. This will make it even more difficult for poorer families to live in Wickford or Billericay driving families and friends apart and pushing up traffic volumes in all directions. The levels suggested will encourage the council to push more development to Wickford and Billericay because of the pound signs, when there is no notion that development here will cost more in the infrastructure required or, judging from the revised local plan ,such infrastructure will be provided In short this suggestion is outrageous and cynical.</p>
<a href="#">PDCS/23</a>	Mr Peter Sharp		<p>The very high rate proposed for Billericay will serve to attract more development to a settlement that is already proposed to be substantially overdeveloped in the Basildon Local Plan.</p>
<a href="#">PDCS/26</a>	Mr Kenneth Richmond		<p>If there are to be differential rates they should reflect the actual cost of delivering infrastructure services. There is no justification for such a large differential between the 3 Towns. The proposed charge for Billericay is excessive. All it will achieve is that developers will want to build larger properties. Due to extensions, rebuilds and in-fill development the stock of 4-bed + homes in Billericay has been steadily increasing. We are desperately short of competitively priced 2/3-bed homes for first/second time buyers moving to accommodate a family.</p>

ID	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/27</a>	Mr Barry Durrant		Any proposal to build housing should have a considerable CIL charge applied to it. If Billericay is to be £350 per square metre, all other parts of the borough should be the same price high price. I certainly do not think the price per square metre for the entire borough should be lower than £350. The current structure suggests that Billericay will become the money maker in terms of allowing infrastructure projects to be implemented in the borough and therefore will see more housing projects which I already object to. It should be £350 per square metre across the whole borough and INFRASTRUCTURE FIRST!!!!
<a href="#">PDCS/28</a>	Mr Malcolm Bull		Higher figures if possible
<a href="#">PDCS/29</a>	Mr Graham Moat		The fixed Flatted Residential rate and that for Basildon are set too low and should both be doubled. Those for Billericay and Wickford should be more proportionate to that set for Basildon and the present differential is not justified.
<a href="#">PDCS/30</a>	Mr T R Bush		
<a href="#">PDCS/31</a>	Chris Yab		
<a href="#">PDCS/32</a>	Mr Roy Barnes		All development will use the services infrastructure irrespective of viability zoning.
<a href="#">PDCS/33</a>	Mr Gavin Taylor		So it is now apparent by this proposal that Billericay is the cash cow of the Borough. Once this comes into effect, if passed, all developments will be pushed towards Billericay! This has already shown itself by Councillor Callaghan screaming at Billericay for taking out 350 homes within the Local Plan. So Billericay will forever be a target to the detriment of its population and the Green Belt. Who will look out for Billericay in the future?
<a href="#">PDCS/34</a>	Mrs Bridget Washington		
<a href="#">PDCS/35</a>	Mrs Karen De Cruz		Disproportionate and excessively higher charging schedule for Billericay and Wickford compared to Basildon with no indication that community infrastructure levy will be used to benefit of these areas specifically as opposed to being used to in the borough as a whole. This levy will only to be passed on to consumers and ultimately would lead to further increase the property prices, making housing even less affordable in Billericay and Wickford.
<a href="#">PDCS/36</a>	Mrs Deborah Taylor		Having a sliding scale dependent on each part of Basildon Borough will encourage Basildon Council to always develop in the most profitable area.

ID	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/37</a>	Mrs Jean Threadgold		I strongly disagree with the different levels of charge for the residential developments in different parts of the borough. The cost of homes is expensive enough without adding extra charges that will most likely be past on to the buyers thereby increasing the cost of the houses
<a href="#">PDCS/39</a>	Miss Susan Wademan		I was surprised to see from the CIL viability study section 1.2 that the Main purpose of a PV assessment, to paraphrase, is "not to threaten the development viability as a whole". This seems to allow leeway for places in Billericay to have high CIL charges, putting off developers, compared to low ones in Basildon. This seems acknowledged by part 2.51. I accept that Basildon is bigger but this seems unfair, and I think when locals read that Billericay developers are having to pay £350 per SM against zero in Basildon, they will again feel their concerns passed over. The original Basildon development plan was carefully weighted WITH open space and the continual encroachment on this is not going down well. The very delayed (who will pay in the end?) zebra crossing by Trafford House and the fact the developers were allowed to provide such a small amount of parking is one case in point.
<a href="#">PDCS/41</a>	Vanessa Carter		
<a href="#">PDCS/43</a>	Mr Malcolm Lewis Straiton		
<a href="#">PDCS/44</a>	Mr Brian Cowling		<p><u>Billericay Development Plan:</u> This proposed development areas of H17A around to 19A form an almost continuous belt. To the south of the railway line. Access to these areas via Tye Common Rd (which is only a lane beyond the boundary of Billericay). Frithwood Lane is not an option until completion of the relief rd (when &amp; who pays) we already have 1/2 mile jams on Tye Common Rd. Can we look forward to gridlock? <u>Services</u> Are the existing services adequate to cope with the increased demand? We already have numerous water mains leaks, there are power interruptions &amp; unplanned cuts, the surface water system needs upgrading &amp; will the gas supply cope? <u>Schools</u> Brightside is near capacity, will expansion provide enough places to serve the new development, or just generate a lot more competition for places? Is the contractor contractually tied to provide for the schools, there is a funding gap. <u>Shops + Services</u> There are no sizeable food outlets servings &amp; SW Billericay, public transport is practically non-existent in the S/W area of development. <u>Public Open Space</u> The space allocation does not seem to be in proportion to the area of development, considering this is green belt land. <u>GP's</u> The developer has made land allocation for premises but it's the G.P.'s need to fill them <u>The ruin of Billericay</u> How much development can a small town stand without losing its character? It survived Queens Park because that was better planned. This development seems to be just about numbers that can be squeezed in.</p>

ID	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/45</a>	Mr John Little		
<a href="#">PDCS/46</a>	Mr Andrew Black		
<a href="#">PDCS/47</a>	Colin Kidner		The CIL rates should be determined by the need for infrastructure needs in different parts of the borough. All development should contribute to infrastructure.
<a href="#">PDCS/48</a>	Julie Kidner		The CIL rate rates should be determined by the need for infrastructure needs in different parts of the borough - all developments should contribute to infrastructure.
<a href="#">PDCS/49</a>	Mr Christopher White		
<a href="#">PDCS/50</a>	Mr Frank Guest		
<a href="#">PDCS/51</a>	Mrs Sarah Wilson		No guarantee that monies raised in Billericay will be used to assist infrastructure required to support any increased population. No guarantee monies raised in Billericay will support increase infrastructure requirements for more population. Developers will absorb cost back through house price pushing Billericay prices out of reach of residents especially young people. Infrastructure first!! not after developments.
<a href="#">PDCS/52</a>	Mrs C Willingale		1) The same CIL should be charged through out the borough. 2) The money should be allocated <u>fairly</u> through out the borough. 3) There would be a levelling out of the cost of housing. 4) If Billericay is to provide affordable housing the CIL should be minimal. 5) House prices in Billericay are already well above average. If new housing in the town has a higher CIL then it will fuel yet more rises in value.
<a href="#">PDCS/54</a>	Mrs Sheila Pullin		The figure of £350 p.s.m is impossible if the (sic) Billericay is to have any smaller properties. Also this figure is wrong in an area with very few advantages i.e. trains full to London from 7am, serious lack of parking, insufficient schools, doctors to cope with current residents. Not including over crowded roads and constant traffic jams.
<a href="#">PDCS/55</a>	Mr Robert Mackey		The greater rate for Billericay would add approx. £35,000 to the price of a house. Billericay needs more affordable housing, a £35,000 surcharge is unreasonable and not justified by National Policy. A flat rate is proposed in adjacent Boroughs. There is no social housing provided in the Local Plan policies so the zero rate proposed on this would have no benefit to Billericay. The need for greater housing provision is across the borough, there should be no discriminatory rates.

ID	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/56</a>	Mr Edward John Dixon		In principle where developments occur in an area of higher housing costs the greater potential for profit should lead to a greater contribution via the CIL. However too high a CIL in Billericay and Wickford may well encourage the release of land for development in order for the Council to gain the maximum advantage. A more balanced distribution of CIL rates with some bias towards more expensive areas would be more appropriate.
<a href="#">PDCS/57</a>	Gillian Legge		
<a href="#">PDCS/58</a>	Mr Bernard Rogers		
<a href="#">PDCS/59</a>	Mrs Suzanne Crowe		
<a href="#">PDCS/60</a>	Mr Rex Kemp		A level playing field is much fairer on all.
<a href="#">PDCS/62</a>	Mrs Carol McCarthy		Basildon rates are lower than other parts of borough. Surely that is not right.
<a href="#">PDCS/63</a>	Mr Stephen McCarthy		Proposed CIL rates are too low.
<a href="#">PDCS/64</a>	Mr Michael Andrews		The excessive proposals for Billericay and Wickford are unacceptable. In particular the figure for Billericay could lead to a cash strapped council seeing Billericay as a funding source for the rest of the Borough. The Local Plan is seeking to disadvantage Billericay in the same way. The viability assessments reflect a distorted commercial environment which should not be accepted by the council.
<a href="#">PDCS/65</a>	Mr Leslie Sharp		What guarantees are given to ensure the monies raised from CIL fro Billericay will be used for the benefit of Billericay and not Basildon.
<a href="#">PDCS/66</a>	Miss Faye Willingale		-CIL should be charged at the same rate through out the Borough. (Otherwise e.g. Billericay homes will start at a higher rate than elsewhere plus as a result Council tax revenue from Billericay will be more than in the rest of the Borough) -The money raised should be allocated fairly to all areas . - Higher CIL in Billericay will fuel a rise in house prices, already above the national average.

ID	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/67</a>	Wendy Toomer-Harlow		These figures are totally unrealistic with inner ?.....? only inner proposing a maximum of £80 for 2019 (Ill thought through Basildon). These levies will ?...? development unviable for both land owners and developers. Both large and small scale. Causing many to withdraw land in the call for sites. This will impact on individual home owners with large gardens particularly in the lower value areas (Bowers Gifford) where any development value realised would be lesser value than their current property value!!This would also applies to properties currently being used for equestrian /farming use in these areas that command values due to their scarcity within this town. .
<a href="#">PDCS/68</a>	Mrs Linda Ling		
<a href="#">PDCS/69</a>	Mr Roland Lazarus		The viability evidence is based on sites having been required to deliver 31% affordable housing under the policy of the Local Plan. The affordable housing policy of the Local Plan is not a sound policy. CIL rates will have to be changed in light of a better affordable housing policy which should result from the plan making process. Ramsden Bellhouse, Noah Bridge and East Basildon should have higher rates of CIL than the Basildon rate. There seems to have been an intention to have a different rate for East Basildon.
<a href="#">PDCS/70</a>	Mrs Jennifer Mint		
<a href="#">PDCS/72</a>	I.T. Legge		
<a href="#">PDCS/75</a>	John Pumfrey		The excessively high rates proposed for Wickford and Billericay would ensure that no further "affordable" housing would be built there (Not there is much now).
<a href="#">PDCS/77</a>	Dr Jonathan Gould		
<a href="#">PDCS/78</a>	Ms Tracey Kernaghan		
<a href="#">PDCS/79</a>	Mr Stephen Ashdown		Rates should be constructed appropriately to the requirement of the community the council serves. Rates to not stagger inline with the requirements of the community and are aimed at revenue generation from larger business/constructors.

ID	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/90</a>	Mr Brian Carleton		<p>Section 6- Residential (Use class C3) - The Preliminary Draft Charging schedule proposes different Community Infrastructure Levy in Basildon, Wickford and Billericay, this mentions 7 different rates. The viability Assessments have been made by the Economic and Planning Departments of the Local Authority and does not make sense when the developers have made their cost assessments for the development and other monies come from the 'Development contributions' as agreed between the Local Authorities, Education, Health and a combination of developer agreements with the water, sewage, utilities and the Environment Agencies. So the CIL seems to be a NEW charge which will be paid for by the community. Item 7 "Do you agree that residential developments funded by the a public authority should be zero rated", this is more to do with Value Added Tax, but how will the ensuing 'charges' be dispersed. What happens after 2034 and how are the liabilities dispersed.</p>
<a href="#">PDCS/91</a>	Mr Alasdair Daw	Billericay Action Group	<p>1. Introduction This is the Billericay Action Group response to the Basildon Council CIL consultation of November to December 2018. 2. Perverse incentive The CIL Preliminary Draft Charging Schedule shows more than half of CIL coming from Billericay (Please see Table in attached original letter) However, removing the S Wickford (1100) and E Basildon (650) allocations that are unlikely to be delivered in the Plan Period presents a starker picture. (Please see table in attached original letter) This discrepancy would be extended further when the larger average size of homes built in Billericay is taken into account. In the Draft Plan this has provided a perverse incentive to channel growth towards Billericay, where growth is less sustainable. If the CIL is approved this will continue at future Plans and Plan Reviews. 3. Other Points • The rate for Billericay is very high, this will affect the viability of reaching 31% affordable homes and delivering aspects of good design within housing allocations. • The cost of CIL will of course be passed onto buyers, the CIL will increase the cost of new homes in Billericay by £28,000 for a home of 80 sq. metres, with most houses being larger. As Affordable Homes are defined as costing 20% less than market homes - it will also increase the price of these. •The large majority of funds will be raised in Billericay despite the town having just 19% of the Borough's population. The overwhelming majority spent outside of Billericay. • Just raising large amounts of money doesn't mean the issues caused by large-scale developments can be resolved by throwing money at them. Building less is clearly an alternative. •The phasing of payments means that it is unlikely that infrastructure can be delivered first. 4. Alternative Approach Despite these issues, it is true that the expensiveness nature of homes in Billericay means there is increased viability here– an alternative way to exploit that would be to consider requiring developers to provide a higher proportion of affordable homes in Billericay.</p>

**Appendix C (2): Residents Schedule of Respondents and Comments on all other CIL Rates**

ID	Full Name	Organisati on Details	Retail comments - Please provide any comments in relation to the CIL proposals for retail here.	Retirement comments - Please provide any comments in relation to the CIL proposals for retirement homes here.	Other comments - Please provide any comments in relation to the CIL proposals for other types of development here.	Proposed Changes to CIL - Do you have any views on whether Basildon Borough Council should give consideration to differential CIL charges based on the existing use of land?	Priorities for CIL - Do you have any views on specific infrastructure projects, or types of infrastructure that the Council should spend CIL receipts on?	General Comments - Please provide any additional comments here.
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ID	Full Name	Organisati on Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/1</a>	Mr Chris Carter		billericay neither wants or needs any further development and therefore does not need any charges for for CIL	billericay does not require any development of any type especially on green belt	we do not want or need any development in billericay	the green belt was created for good reason and this land should Never be built on this will only satisfy greedy farmers and basildon council it has no merit to billericay and will ruin a beautiful town one basildon concrete mess is enough for any county dont create more!	dont build on green belt in billericay then you will not have to consider infrastructure which has not happened thus far	
<a href="#">PDCS/2</a>	Mr Neil Stanley							
<a href="#">PDCS/3</a>	Mr James Moran		The high street is already under pressure and charging a further 'tax' is short sighted and could be a nail in the coffin for businesses that are already struggling.	These costs will just be passed on to retirees, many of whom will be living on the breadline anyway. A frankly disgusting proposal and whoever came up with the idea should be ashamed of themselves.				

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/4</a>	Mr John Haverty					I would agree with this in principle if it makes it more reasonable to turn agricultural land to development without giving the land owner an inflated profit for selling this to allow building development.	more schools improved road maintenance	
<a href="#">PDCS/5</a>	Mr Paul Broadfield				Same as above	It should certainly be considered	The requirements differ by location. In Billericay housing an additional 5000/6000 people will necessitate additional doctors, school places and most importantly, more car park places.	
<a href="#">PDCS/6</a>	Captain Beverley Beale			rates should be the same irrespective of location of retirement homes		Basildon Borough rates should reflect Government Guidelines	School (expansions) and medical facilities (GP surgeries, hospital bed increases etc) occasioned by residential developments should have first priorities followed by other infrastructure projects needed to satisfy local conditions	
<a href="#">PDCS/7</a>	Mrs Margaret Beale			All rates should be the same		Agricultural land should be charged at a much higher rate than industrial land to encourage reuse of "brownfield" sites and preserve land set aside for food production and nature protection	Schools and medical facilities and public transport should have first priority. Other priorities should follow based on local needs	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/8</a>	Mr Matthew Eva			Rates should be the same across the district. The proposal to have higher rates in Billericay could be seen as a deterrent to develop in Billericay		If it were to discourage developing green field in favour of brown field development then yes	If the CIL is not sufficient to fund the required infrastructure then the developments should not go ahead. Current needs in Wickford are Doctors/medical facilities.	
<a href="#">PDCS/9</a>	Mr Philip Woods							
<a href="#">PDCS/10</a>	Ms christine wade						Prioritisation by area rather than borough wide as everyone needs effective infrastrucutre.	
<a href="#">PDCS/11</a>	Mr Phillip Davison							
<a href="#">PDCS/12</a>	Ms Sylvina Tate							
<a href="#">PDCS/13</a>	Mr Andrew Wade							
<a href="#">PDCS/14</a>	Mr Leo Defoe			Given the need, I would like to see a nominal CIL rate applied across the Borough		I would like to see brownfield sites given a lower rate than undeveloped sites		
<a href="#">PDCS/15</a>	Mr MD Stanford							
<a href="#">PDCS/16</a>	Mr MD Stanford							

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/17</a>	Mr David Threadgold		These need to be equalised and as low as possible. Town centres are dying, retail parks are under pressure, these charges will simply stop development in both places and therefore reduce job opportunities.	Why is Billericay being treated differently? It is not a cash cow for the rest of the Borough. We need more more retirement homes across the Borough and so the lowest uniform rates should be applied. If £10 per square metre is the rate for every other area then it should be the same for Billericay. Good retirement home provision will be encouraged and this in turn will release larger housing units for the young and their families.	There is no indication of what this money would be used for. It is simply another cost to be added to the house buyer. If we believe that a home owning democracy this is yet another blockage to reaching that goal. No charge at all is the best outcome of this consultation.	I do not want green-belt land built on at all. The cost will still be passed on to the ultimate consumer. No charge should apply but protective measures need to be enforced to protect the gree-belt.	First, 100% of any CIL money needs to be spent on infrastructure in the area it is raised, not syphoned off to be used to support schools or the Police. Second, if you bring in differential rates then the money should be spent in the same ratio in the area it was raised in. That is £350 per square metre money should be spent on improving the infrastructure in Billericay and not Basildon town cetre.	
<a href="#">PDCS/18</a>	Mrs Jenni Hamilton-Morris		it is normally large or very large retailers who set up outside of town centres, who would be financially able to pay the higher price and whose large premises have a greater impact on the environment. Small retailers who set up in town centres already have higher rates to pay, so it is unfair to saddle them with yet another high rate as this could discourage small businesses to open in town and hence hasten the demise of the town centre	Surely the rate should be the same throughout the borough - all retirement homes charge roughly the same amount so why should one town have a much higher rate. Better to charge £30 per square metre on all retirement home proposals throughout the borough - it would be a lot fairer and probably result in more money coming in as homes will be built throughout the borough, not just in Billericay.		It should be the same as both providing a service - only reason to charge different would be to make more money from one sector.	CIL receipts should be spent in the town they are collected from and on the most important need that benefits the whole town.	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
			with more empty properties.					
<a href="#">PDCS/19</a>	Mrs Jean Carter			The higher charge for Billericay is unreasonable unless the amount generated is to be ringfenced for spending in Billericay. The town already needs additional Parking and GP services, the need for which will increase substantially with further retirement homes.	Other development will add pressure on roads and parking and therefore should be charged more than a nominal rate as any development will impact on infrastructure and should pay a proportional cost towards this. The burden should not all fall on housing.		Neighbourhood facilities for new large residential developments to enable residents to walk to facilities. Eg GP services, local shops and play areas. Parking in Billericay, particularly an option for long stay parking accessible to the high street.	
<a href="#">PDCS/20</a>	Trisch Knight			The rate should be common across the entire Borough, there is no justification for applying a charge only in Billericay		The CIL should be structured so that it encourages developers to re-use former industrial sites, commonly referred to as brownfield sites, rather than building on land that is currently open and may have agricultural or other amenity use.	We should minimise the building of new roads to help prevent urban sprawl and further erosion of the green belt, but the CIL could be spent on improving and maintaining existing roads as many of these suffer from neglect in terms of pot holes, road markings etc. In addition, the CIL could be spent on essential community needs including health care provision, new schools and refurbishment / extension of existing schools.	
<a href="#">PDCS/22</a>	Mrs Susan Tomlinson			I can see no justification for a charge on retirement properties in Billericay only. There is no extra expense associated with		There may be some justification for this in that it is encouraging development on brownfield sites.	It is important to plan for shorter journeys and easier journeys to cut emissions from static and	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
				their location in Billericay. If retirement properties are to be encouraged to release larger properties for families then this applies equally across the borough. Making properties more expensive in one area will have the effect of driving elderly people away from their support of relatives and friends, increasing traffic and also the need for more social support for the elderly. If you live close to people it is much more likely that you can support them when needed.			moving cars, so local services and improvements to roads are essential	
<a href="#">PDCS/23</a>	Mr Peter Sharp					Agree with CIL being used to disincentivise development of greenfield sites in favour of brownfield sites.	CIL should be spent in the areas most directly affected by the housing development from which the CIL was collected.	
<a href="#">PDCS/24</a>	Mr Peter Sharp							

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/26</a>	Mr Kenneth Richmond		The diminishing number of particularly independent shops in Billericay High Street has been a concern for years. It used to be dominated by Estate Agents and Charity Shops, now Hair Dressers and Coffee Shops have joined the list. This year we have lost Carphone Warehouse, New Look and an independent Greengrocer. All 3 are still empty. Other properties with retail on the ground floor have been converted into flats. Any contribution to reviving the High Street are welcome.	I can see no justification for charging a higher rate in Billericay than elsewhere. We need more care and retirement irrespective of where they are located.		I can see the logic for differentiating on this basis, perhaps with a higher rate for developing Green Belt.	There will never be sufficient funds so prioritisation will always be required. The danger is that an area of historic underinvestment will never catch-up if a simple pro-rata formula is adopted. This is where we have to rely on the judgement of experts.	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/27</a>	Mr Barry Durrant			I don't see why Billericay is the only area to warrant a charge for retirement homes. In the spirit of fairness all areas of the borough should pay an equal amount to retirement home proposals and that amount should not be £0		There should be no building on any kind of Green Belt including Agricultural land. Brownfield first once an accurate assessment of the necessity of the housing need has been achieved	Infrastructure first. Roads, Hospitals and Schools and Surgeries. Then housing. there will be less opposition to housing if these are already there. How can you object to Housing if they are already built. If the CIL is there you know you will then get the cash for the infrastructure so like every other human being who has a budget deficit. Pay to build first and when the money comes in from CIL, pay off the bill.	
<a href="#">PDCS/28</a>	Mr Malcolm Bull		Need much higher figures	No should be much higher	Should be charged more	Much higher figures for building on Green belt	Roads, GP practices, leisure green spaces should have priority	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/29</a>	Mr Graham Moat		I consider that the agreed CIL rate for Billericay is far too high and as the Regulation 40 of the CIL Regulations is not detailed within the schedule it makes it difficult to then determine the manner of the calculation to verify that the same process is being applied across the country. Yet again Billericay is being targeted as a cash cow for the Council.	In my view retirement and affordable homes should be made exempt from any CIL as any such charge is more than likely being passed on to the ultimate residents. Also I feel that there should be a correlation made to link any such levy to the actual infrastructure uplifts within each area that should be set out in the associated Local Plan.	Again this is seemingly too low and there is no precise definition of what Other Types of Development are covered. Presumably this in all non-residential. Development of Medical and School buildings should be exempt. But Hotels and Warehouses etc should pay a higher levy.	These have been set out in the above comments.	They should be spent on publicly notified infrastructure improvements as is implied by the term CIL.	
<a href="#">PDCS/30</a>	Mr T R Bush						Road maintenance.	
<a href="#">PDCS/31</a>	Chris Yab							
<a href="#">PDCS/32</a>	Mr Roy Barnes		It is essential to ensure that any new development separately and obviously funds the infrastructure that it will 'plug-into'. It is equally necessary to ensure that the levy is ring-fenced for the infrastructure and does not disappear into the general rate. The viability of town-centre retail is doubtful. The public is rapidly adopting on-line shopping	Retirement home development in Billericay is largely carried-out by the private sector and should therefore be treated like any other commercial development. Public Sector retirement home development should be treated as a public service and receive funding from the infrastructure levy.			To be seen to be viable CIL receipts must be ring-fenced for infrastructure development.	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
			and if town-centre retail outlets cannot support themselves, then they should be allowed to fade away.					
<a href="#">PDCS/33</a>	Mr Gavin Taylor		Retailers are suffering from the onslaught of online retailers and the preference of customers to shop from home. The retailers who have or are near going into administration is getting worse. Therefore they need all the support they can get to keep town centres viable.	In the end whatever charge you levy on the retirement home will have to be passed onto the people living there, and this becomes more expensive to pensioners. However in line with a nominal charge, retirement homes should have their fees capped too.	This is too simplistic. It depends on what use the development is for, and should still be put under the tiered system of CIL	Does this mean that the Green Belt gets another bashing nad become part of the travisty of over development. As mentioned above, who will protect the Borough, alas I don't think it will be the Council Officers or those voted in to look after our interests, especially on past performance over the last few years!	This again is part of the whole problem. No one is brave enough to say there are too many people in the South East and more needs to be done to get the North included in the wealth of the South East. We cannot keep building and building, as it is the infrastructure is already blown with not enough hospitals, GP's, schools, Police, fireman and the list goes on. Again this is all just sticking plasters!	
<a href="#">PDCS/34</a>	Mrs Bridget Washington							
<a href="#">PDCS/35</a>	Mrs Karen De Cruz							
<a href="#">PDCS/36</a>	Mrs Deborah Taylor			Again, Billericay is being used as a cash cow to support Basildon Borough. This will encourage further over development.		The future use of land is more important	Roads, pavements, railways. It should also spend money on trees and plants to replace what is taken away and promote a healthy living environment which mitigates pollution.	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/37</a>	mrs Jean Threadgold			The CIL levy seems like an in direct tax on the companies wishing to build the retirement homes, something the borough needs is more purpose built retirement homes, this may put businesses off building in the area.			All infrastructures need money spent on them, roads schools will be in high demand if the population increases due to extra houses	
<a href="#">PDCS/38</a>	mrs Jean Threadgold			The CIL levy seems like an in direct tax on the companies wishing to build the retirement homes, something the borough needs is more purpose built retirement homes, this may put businesses off building in the area.			All infrastructures need money spent on them, roads schools will be in high demand if the population increases due to extra houses	
<a href="#">PDCS/39</a>	Miss Susan Wademan		The town centre is now very fragmented between Eastgate and Westgate shopping centres. There are a large number of empty shops and I have noticed a considerable decline in shoppers from previous years. Any developments need to be contributing to making people feel safer walking from one end to the other in Winter otherwise Boots, WH Smith, Peacocks etc will suffer and potentially close. If the CIL is low or zero I feel it will attract low cost bad quality retail offerings.	Infrastructure in Basildon needs more investment. Whilst I would not want to see no retirement homes built, the infrastructure of the town mostly dates from the 1960's and is failing all at once. I want developers to feel committed to improving the town and not in it for short term gain.	Personally I feel it needs to be higher. Displacement of people from more expensive London housing areas is already having a detrimental effect on the town. Who will pay for the new schools and surgeries if not the developers?	No comment.	I would prefer my library to stay open rather than be forced to make an expensive bus journey to borrow a book. Libraries, health centres, pavements and lighting are priorities for me, but I also note the councils level of unpaid rent has rocketed from minimal to ridiculously high. Maybe someone should be employed to tackle this.	
<a href="#">PDCS/40</a>	Miss Susan Wademan		The town centre is now very	Infrastructure in Basildon needs more	Personally I feel it needs to be	No comment.	I would prefer my library to stay open	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
			fragmented between Eastgate and Westgate shopping centres. There are a large number of empty shops and I have noticed a considerable decline in shoppers from previous years. Any developments need to be contributing to making people feel safer walking from one end to the other in Winter otherwise Boots, WH Smith, Peacocks etc will suffer and potentially close. If the CIL is low or zero I feel it will attract low cost bad quality retail offerings.	investment. Whilst I would not want to see no retirement homes built, the infrastructure of the town mostly dates from the 1960's and is failing all at once. I want developers to feel committed to improving the town and not in it for short term gain.	higher. Displacement of people from more expensive London housing areas is already having a detrimental effect on the town. Who will pay for the new schools and surgeries if not the developers?		rather than be forced to make an expensive bus journey to borrow a book. Libraries, health centres, pavements and lighting are priorities for me, but I also note the councils level of unpaid rent has rocketed from minimal to ridiculously high. Maybe someone should be employed to tackle this.	
<a href="#">PDCS/41</a>	Vanessa Carter		Retailers should not have to pay CIL given current trading conditions.				Extended conservation, GP surgeries, London to Southend Trains, Air quality	
<a href="#">PDCS/43</a>	Mr Malcolm Lewis Straiton		what are "viability issues"			its just another tax	they wont have any. Like their paymasters. They will have to live within their means.	
<a href="#">PDCS/44</a>	mr brian cowling							

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/45</a>	Mr John Little			1) we in the united kingdom are lucky to be living in a democracy. 2) It appears to me to be grossly undemocratic to charge ten times the amount of CIL for retirement homes in Billericay than anywhere else within Basildon Borough. Surely a fairer system would be, the charge of CIL to all retirees throughout Basildon Borough to be the same for any location within its area. 3) If the above (no.5) is implemented exactly where does the term 'Billericay' begin and end?				
<a href="#">PDCS/46</a>	Mr Andrew Black							
<a href="#">PDCS/47</a>	Colin Kidner			Surely the same CIL rate should be charged in all parts of the borough.			Why is the CIL rate for Billericay on a par for parts of London? What are the arrangements for timing of payments? Will they be collected before development began is make sure that the "infrastructure first" swept supported by local politicians actually happens?	
<a href="#">PDCS/48</a>	Julie Kidner			Surely the same CIL rate should be charged in all parts of the borough.			Why is the CIL rate for Billericay on a par with parts of London? What are the arrangements for the taking of payments? Will they be collected before developments begin to make sure that the 'infrastructure first' concept supported by the	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
							local politicians actually happens?	
<a href="#">PDCS/49</a>	Mr Christopher White		The charge should be used for updating and servicing the local area where it was collected.	Why charge extra to live in a retirement home in Billericay.			The council should spend the CIL receipts on projects in close vicinity to the property it was collected from	
<a href="#">PDCS/50</a>	Mr Frank Guest					If the land is developed for housing cannot see why there should be different rates based on what the land was used for previously!		
<a href="#">PDCS/51</a>	Mrs Sarah Wilson		Lower charges to assist high streets excellent idea	Should be same in Billericay as rest of borough if you want local residents to move out of larger property to affordable retirement where developer not hiked price to cover CIL rate	Still need funds to create infrastructure	Does this mean agricultural land could be cheaper for developer to build on. Not good as already insufficient farming produce as a nation to sustain our population.	Ensure populations can access various health care services as locally as possible as also helps transport difficulties and priorities communities and work for local people. Ensure schools do not become massive [bodigs] sic - similar to above has sufficient places in walking distance	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/52</a>	Mrs C Willingale		Out of town centres need to pay more in order to protect town centres and independent shops.	1) £100 per,sqm in Billericay is inappropriate. I will result in retirement properties being too expensive for our OAP's to contemplate downsizing, which in turn will keep them in family sized houses. 2) The council should consider building a retirement village with properties realistically priced so encouraging older couples/singles to move/downsize and free up family sized home. These homes often are near to schools and amenities.		There should be HUGE CIL on agricultural land because it <u>shouldn't</u> be built on same as Green Belt should be just that a division between boroughs.	Upgrading roads in general, filling pot holes, improving lighting along main roads. Widening roads where necessary <u>IF</u> all the development takes place in Billericay. Providing parking (FREE) building new cottage hospitals for recuperating patients so free up beds in hospital(s). Free parking at the hospital.	
<a href="#">PDCS/54</a>	Mrs Sheila Pullin		In an area with serious lack of parking facilities such as Billericay.	People are unable to down size in view of lack of bungalows and retirement homes in their area. A common rate should be applied to allow families to stay together meaning less need fro Home Care packages.	Not without knowing what other types of development was proposed. In addition I have serious concerns about the lack of water and other services in the area which, as this year proved (sic) has very low rainfall.	The Green Belt should not be considered for building. However land previously used for industry could be charged at a lesser rate to compensate the builders for additional costs of clearing etc.	In Billericay the needs are sic <u>notnore</u> residents until services i.e schools, doctors, etc are in in place to deal with influx. The CIL raised from the Billericay are should (sic) be spent on these facilities. In addition diverting traffic from the narrow roads around area the area.	
<a href="#">PDCS/55</a>	Mr Robert Mackey			The necessity for retirement houses is consistent. The pricing policy should be consistent why is it thought necessary to charge more for Billericay?			There is a need for a 'joined up' planning of infrastructure by the Council, the County Council and the NHS.	
<a href="#">PDCS/56</a>	Mr Edward John Dixon		CIL on out of town retail should be set at a higher rate to discourage such competition to traditional high streets. CIL on town centres should be set low	Where retirement homes give rise to greater population density and therefore more efficient use of land they should be encouraged with a lower CIL.	CIL should be higher.	If a higher CIL were to discourage development on land previously used for agriculture this would be beneficial. However a high CIL that would encourage the Council to release land because of financial benefits should not be allowed.	CIL receipts should in the first instance give rise to improved health facilities, schools and community halls might be included. Also some road improvements, but	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
			to encourage traditional retail.				not large scale new road building.	
<a href="#">PDCS/57</a>	Gillian Legge		It seems preferable to encourage town centre retail proposal to enhance high street shopping rather than out of town.	No wonder Billericay is not very well served with retirement homes.	Can't comment as don't know what kind of development	I think CIL should be higher for green belt development than for brown field sites.	CIL receipts should be spent in the area that they were received.	
<a href="#">PDCS/58</a>	Mr Bernard Rogers			There should not be different charges in any area. all should be same (sic).	This would make a f?? playing field across the Basildon area.	If the land used for building is Green Belt then a tax should be paid on its increase in value.	We pay for the infrastructure in our normal; council rates.	
<a href="#">PDCS/59</a>	Mrs Suzanne Crowe						Transport links especially railways. Car parking Developing decent recreational facilities.	
<a href="#">PDCS/60</a>	Mr Rex Kemp		Any encouragement to help town centre shops is very important.	There should be no distinction between different areas in the borough.	Keeps fairness across the borough.	Depending on the future use to which the land will be put. (See 6 and 7).	For the benefit of the community as a whole e.g more parking spaces; maintaining road services and repairs.	
<a href="#">PDCS/62</a>	Mrs Carol McCarthy			The rates should be the same through out the borough.		Agricultural land should have preferential rates i.e lower rates.	CIL spending should be where the revenue is raised from not throughout the borough.	
<a href="#">PDCS/63</a>	Mr Stephen McCarthy			There should be no disparity between rates throughout the borough.	Too low.	Agricultural land should have a lower rate.	CIL spend should be proportionately spent relative to where the	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
							CIL revenue is raised.	
<a href="#">PDCS/64</a>	Mr Michael Andrews		The viability issue relating to town centres is the result of unconstrained profiteering (sic) by landowners. Whilst there must be action to make town centres viable the Council should be addressing the real issue, not pandering to these excesses. All retail should be contributory to CIL equally.	A level discriminatory pricing is not inappropriate, but such a difference is unacceptable and could even deter the building of such properties in Billericay.	All development contributes to infrastructure need and should therefore contribute to its cost more equitably. Some differential is not inappropriate but that proposed is excessive.	CIL should take into account the profit being made from development as well as the loading it on infrastructure.	CIL funding projects should be based on independently adjudicated need not political expediency or vote winning opportunity.	
<a href="#">PDCS/65</a>	Mr Leslie Sharp							
<a href="#">PDCS/66</a>	Miss Faye Willingale		We need to protect independent shops and other high streets/town centres so the rate should be less for them.	-£100 p.sq.mtr is not appropriate for Billericay retirement homes. - Makes retirement homes too expensive for some OAP's to consider. - Necessary to encourage older people to downsize in order to release family sized homes.		Very high CIL to be applied to agricultural and green belt to deter development. Green Belt is meant to be a buffer zone between boroughs. Need to discourage use for buildings.	CIL should be spent on improving all amenities /roads/lighting. Wider roads Mending pot holes Support of social problems -new or updating schools, medical facilities, parks, open spaces, waste disposal. Free parking for stuff @ the hospital.	
<a href="#">PDCS/67</a>	Wendy Toomer-Harlow				Should not be implemented unfair tariff penalising land owners. Will strangle development as totally unrealistic to expect farmers to subsidise development within the town to the benefit of developers and local authority.			

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/68</a>	Mrs Linda Ling		Town centres are not thriving due to on line shopping.			Keep agricultural land for food, crops, and animals. Industrial land for jobs.	Receipts from Billericay spend in Billericay. Receipts from Basildon spend in Basildon. Spend at Lake Meadows improving facilities, extra play equipment for children of all ages. (for extra children to use) Improve swimming pool, changing rooms, waiting area, lighting, CCTV.	
<a href="#">PDCS/69</a>	Mr Roland Lazarus			The CIL on proposals for retirement homes should take into account the need to being met. Retirement homes run as charitable (sic) , not for profit facilities - for the blind for instance, should be zero rated. Private, for profit retirement homes will be more viable the more they can charge and tend to provide fewer new residencies the larger the floor space of each new residential home. Seeking to meet more need and maximise CIL receipts. CIL should be higher on larger retirement homes per square metre and lower on smaller retirement homes per square metre. Demand for retirement homes is higher in Billericay than the rest of borough because the population of Billericay is on average , older and lives longer. It should be			The priority should be the things that add social wellbeing such as schools, hospitals, public halls and sport facilities, new footpaths and new wildlife sites, cycling facilities. CIL should not be spent on things that will increase road traffic and pollution. There should be no new main roads or car parks. Instead, traffic calming measures and one-ay schemes should be used with new bus stops for improved public transport.	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
				expected that the population of Basildon will age and live longer than now by the end of plan.				
<a href="#">PDCS/70</a>	Mrs Jennifer Mint							
<a href="#">PDCS/72</a>	I.T. Legge		The evidence indicate an increase of demand in out of town shopping centre and on line providers at the expense of traditional Town Centre outlets. It follows that town centres are the major losers in the new environment and less able to pay the overheads. I therefore favour a recognition of the increasing burden (less profitable) trading of the traditional, more convenient for the elderly.	By definition the retirement home are places of final rest for the elderly who are less able to finance such accommodation. This appears unfair to the people in work with little or no family support when past their wage earning lives. They are the ones who have spent their lives paying the taxes and building the society with all its benefits the younger generation enjoy today.		Where land can no longer be used for appropriate agricultural purposes it is agreed that other more suitable uses should be considered. There should be strict observance of historic " Green Belt" limitations		

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/75</a>	John Pumfrey		Given that online retailing is booming a larger percentage of the total spend. I would dispute the need for any more outside Town Centre development and since road congestion and parking are already problems perhaps it should be higher than £90/m2.	It is already virtually impossible to downsize within Billericay because of the unavailability of similar homes at reasonable prices.	Development s (sic) which will provide significant long term employment opportunities should be encouraged. £10/m2 is not exactly 'nominal' if the site is a large one1.	Agricultural land should be subject to a much higher rate of CIL than brown sites in order to discourage encroachment.	CIL receipts should be spent predominantly where they are generated.	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/77</a>	Dr Jonathan Gould		Local shopping parades pay a valuable role and will be needed as the population increases. These type of retail centre should be charged in the same way as town centres, all at a rate in the range £30 to £50 per square metre Larger out of town retail centres can pay up to £90 per square metre					

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/78</a>	Ms Tracey Kernaghan		Local shops are important and should be encouraged. Because it will become more difficult for people to get around and access the town centre as a result of the changes in the local plan, these facilities will become even more valuable as places to get food and get deliveries sent. I am happy for new out-of-town retail centres to be charged but not local shops.	It is important to encourage and enable older residents to move into retirement accommodation in order to release family homes for young families. A punitive CIL will not do this. The proposed CIL levy in Billericay is out of proportion to the infrastructure being provided. In particular, older residents will need access to the 535m <sup>2</sup> floor space of health services that have been identified as needed but are not been provided in the local plan. The charge should be less than that of houses and uniform throughout the borough.		The CIL should not be charged on sports grounds, parks and public open spaces. These should not be built on agricultural land as a way of manipulating the rules on building on green belt. However, if the government proposed a higher CIL for building houses on farmland compared to building those same dwellings on brownfield sites, then I would be in favour.		

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/79</a>	Mr Stephen Ashdown		<p>Outside business to not receive the support and infrastructure from the Council that those inside do. The council should be generating interest in becoming a small business outside of the town centre to attract small business to areas like Wickford or Billericay or one of the smaller towns/villages.</p>		See prior comments	<p>Rate stagger with respect to land use is appropriate but only when balanced with the needs of the community which the council serves; business/constructors which are not local are not a consideration and should have a smaller voice.</p>	<p>CIL must be appropriate to the community; any changes to business or residential land must be directly and immediately reflected in adequate infrastructure support sponsored by the CIL and not any other enterprise.</p>	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/90</a>	Mr Brian Carleton		<p>Part B - Retail Use Class 1. The rate of £90 per square metre is unacceptable as I was not informed of the reason for this CIL and what the "Viability evidence" for proposals outside town centres are, and why this was not applied before and the discrimination for two centres at £10.00 per square metre. Is this in addition to 'business rates' and who makes this payment 'annually' (presumed). New development costs include for new roads and improvement to existing roads, drainage and utilities. Generally the remaining parts of infrastructure such as schools, healthcare, open spaces and leisure facilities are subject to negotiation by the respective authorities and the developer including assessments of flood, habitat, environment etc. so why do you need a CIL.</p>	<p>Section 5 - Retirement (class 2 and 3) - the rates of £100.00 per square metre for Billericay and £10.00 for elsewhere is not properly explained as to the reasons for the different rates. Are these 'one-off charges' or 'perennial'. Are these rates additional to Council Taxes? I presently view these charges as 'suspicious', new ways to extract money from the hard pressed community</p>	<p>Section 7 - Other types of Development - the same questions apply as given in sections 4 to 6 above.</p>	<p>Section 8 Proposed changes to CIL. If I have never heard of the CIL Regulations before, and in examination of these documents (unknown to the public) it leaves me suspicious that these regulations are designed to add to the public financial burden and an indirect tax. I am trying to find an explanation to justify these charges.</p> <p>If these charges apply to new developments only, then the costs will be placed on the sale or rent of the properties, how is this justified and has any thought been given to the fact that people will only go for the cheaper properties because of costs, and will the Estate Agents and Legal Conveyancers provide this information, as additional, to the prospective purchaser? Present Council Tax charges are considered exorbitant and possibly not cost effective, so any additional financial burdens are not likely to be welcomed.</p>	<p>Section 9 - Priorities for CIL. I am concerned that there is no mention of CIL in the Core Strategy or the Land Development Framework documents. All development costs are absorbed by the developer and all other costs such as 'Development Contributions' to the Education, Health etc as mentioned before are taken into consideration. What type of 'consultation' took place to examine the merits of the CIL. By imposing a CIL this will be reflected in the 'sale or rent' price.</p>	

ID	Full Name	Organisation Details	Retail comments -	Retirement comments -	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/91</a>	Mr Alasdair Daw	Billerica y Action Group					5. Priorities for CIL Open Spaces can be obtained for the benefit of the people of the borough. In Billericay these could include (see Table in attached letter )	

**Appendix D (1): Organisation Schedule of Respondents and Comments on Residential Development**

ID	Full Name	Organisation Details	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/21</a>	Mrs Debbie Mack	Historic Environment Planning Adviser Historic England			
<a href="#">PDCS/25</a>	Mr Roy Warren	Planning Manager Sport England			
<a href="#">PDCS/42</a>	Richard Carr	Transport for London (TfL)			Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the CIL Preliminary Draft Charging Schedule
<a href="#">PDCS/61</a>	Martin Grant Homes	Martin Grant Homes	Steve Smith	Turley Development Viability	<p>1. Introduction Purpose 1.1 These representations are submitted on behalf of Martin Grant Homes (hereafter "the representor") and have been prepared by Turley Development Viability. Martin Grant Homes 1.2 Established in 1978 Martin Grant Homes deliver premium specification homes in prime locations throughout the Home Counties and are now recognised as one of the leading house builders in the South of England. Purpose of this Document 1.3 As one of the more prominent house builders in South Eastern England, with a specific interest in one of Basildon Council's draft allocation sites, which will have an important role in delivering the Local Plan, the representor has a substantial interest in working with Basildon Council (hereafter 'BC') to ensure that the proposals for the Draft Local Plan ('DLP') and a Community Infrastructure Levy ('CIL') charging regime will be fair, effective and lawful in operation. 1.4 The representor has set out the considerations viewed as highly relevant for BC to consider in proceeding with the preparation of a CIL Draft Charging Schedule following this consultation process. 1.5 The representations have been prepared by Turley based on its experience of preparing development advice and viability appraisals in support of a wide range of development proposals throughout the UK. 1.6 This document sets out the representor's representations in respect of the "Basildon Local Plan and CIL Viability Update Study" (hereafter 'VUS') and the "Basildon Local Plan and CIL Viability Update Study Addendum - Further viability advice and clarification for Basildon Council" (hereafter 'VUS Addendum') as published in February 2018 and September 2018 respectively. The documents have been prepared by Porter Planning Economics Ltd (hereafter "PPE"). 1.7 The VUS and VUS Addendum provide evidence to support the CIL Preliminary Draft Charging Schedule (hereafter 'PDCS') and were issued for consultation on 1 November 2018. 1.8 The assessment of appropriate CIL charges are of particular importance to the representor as it has the potential to impact on development viability in respect of the Policy H13 Land North of Southend Road, Shotgate site, where they have land interests. Structure 1.9 This representation document is structured as follows: • Chapter 1: Introduction • Chapter 2: Representations – provides a summary of the representations to the VUS and VUS Addendum documents, which underpin the level of CIL charge as set out in the PDCS. Right to be Heard 1.10 The representor requests the right to be heard before the Examiner at the BC CIL DCS Examination. Privacy Notice - Strategic Planning 1.11 Turley acknowledges the Privacy Notice, as published on the BC web site and agree to data being held and used for the purposes stated within the Notice. 2. Representations to Basildon Council CIL PDCS Consultation 2.1 This section of the document presents the views of the representor regarding BC's published CIL PDCS and the updated accompanying viability evidence base – the Basildon Local Plan and CIL Viability Update Study and the Basildon Local Plan and CIL Viability Update Study Addendum. 2.2 This chapter is structured with reference to the questions set out by BC. Responses have been provided in respect of those matters which directly relate to the</p>

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					<p>representor's interests. The right to provide further responses in respect of the matters covered herein, and other matters, is reserved for DCS consultation and DCS Examination. 2.3 The representors' representations focus on the £230 per square metre (psm) charging rate proposed for Residential (C3) development in Wickford as set out in the PDCS. 2.4 The representor fundamentally disagrees with BC's proposal to charge a £230 psm CIL rate on sites in Wickford within the PDCS. It is requested that BC re-assesses the viable CIL rate using revised appraisal assumptions, as referenced in this document. 2.5 Further elaboration is set out under the following sub-sections. Appraisal Methodology &amp; Presentation 2.6 Residential (C3) summary appraisals within the VUS are provided for only three strategic sites and a single 20 unit generic site. It is not possible to carry out appropriate due diligence during the consultation period if appraisals are not provided for each of the modelled schemes. 2.7 Also, no cashflow information is provided in respect of anticipated rates of sale or the adopted construction periods. Again, this lack of information prevents appropriate cross checking and due diligence in the consultation process. It fails to accord with both the Government's National Planning Policy Framework (NPPF) 1 and Planning Practice Guidance (PPG)2, which set out clear requirements for transparency in the publication of all financial viability evidence within the planning process. 2.8 The representor requests that copies of all appraisals and cashflows are provided to support and evidence the viability conclusions as set out in the VUS. 2.9 The appraisal methodology is unclear at present – with correlation between the appended development appraisals and the final proposed CIL rate challenging to establish. 2.10 The representor requests that further data and explanation is presented within the appraisals, or wider VUS, to demonstrate the calculation of potential CIL liability as drawn from the appended appraisals. 1 MHCLG (2018) National Planning Policy Framework 2 MHCLG (2018) National Planning Practice Guidance - Viability Sales Values 2.11 The VUS adopts sales values dating from January 2014 to June 2016. The historic comparable data is inflated to values as at November 2017 by applying Land Registry HPI data. 2.12 Whilst HPI data is regarded as a reasonable data source, it is applied on a borough wide basis and takes no account of stronger or weaker performing areas within the borough. Therefore, the adopted values may be exaggerated or under-estimated on a zonal, localised basis. 2.13 The representor requests that viability testing must be carried out on the basis of recent, and localised, market sales value evidence to ensure that accurate testing of current market performance across the borough is provided. 2.14 It is noted that construction costs are based on Q1 2018 average rates. The disparity between the assessment of sales values and construction costs holds the potential to produce inaccurate results, and a consistent base date must be adopted as close as possible to the publication date of the viability assessment. Benchmark Land Values (BLV) 2.15 It is unclear as to what evidence has been utilised to arrive at the BLVs within the VUS. Limited land value evidence is provided at VUS Appendix 5, but no analysis or appropriate explanation of the approach adopted in interpretation and adoption of this evidence in the assessment of BLVs is provided. 2.16 The representor is concerned that the adopted approach does not form a robust and evidenced basis upon which to set benchmark land values for viability assessment. The degree to which these land values are realistic is critical – for the BLV forms the 'tipping point' at which CIL 'overage' (i.e. liability) can be levied. If this is misrepresentative of the market for land, it completely undermines the validity of the viability evidence base. 2.17 The link between evidence and viability assessment is opaque and requires the provision of further explanation from PPE and BC. At present, the BLVs appear arbitrary and are not underpinned by appropriate local transactional or other market evidence. 2.18 Given that the approach taken by PPE uses land value thresholds as a fundamental viability consideration, the BLVs must be based on robust local evidence. 2.19 The VUS adopts differential land values for greenfield and brownfield sites but no evidence is provided within VUS Appendix 5 to show that brownfield land sold for development will achieve a higher value than greenfield land. 2.20 Rectifying present deficiencies in the use of land value comparables to support the BLVs in the BC's published CIL VUS is regarded as essential in order to conform with PPG3, which states: 3MHCLG (2018) National Planning Practice Guidance – Viability (Paragraph: 014 Reference ID: 10-014-20180724) "Benchmark land value should: ...be informed by market evidence including current uses, costs and values wherever possible. Where recent market evidence is used to inform assessment of benchmark land value this evidence should be based on developments which are compliant with policies, including for affordable housing. Where this</p>

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					<p>evidence is not available plan makers and applicants should identify and evidence any adjustments to reflect the cost of policy compliance. This is so that historic benchmark land values of non-policy compliant developments are not used to inflate values over time." 2.21 In accordance with the Government's methodology set out in PPG, it is essential that an appropriate number of land sales comparables are provided and weighted/adjusted in order to establish appropriate BLVs for the proposed value areas, and any proposal to adopt differential greenfield and brownfield land values must be supported by a large enough range of comparable data to draw reasonable average value conclusions for each of the proposed CIL charging areas (zones). At present, the published viability evidence base fails to do this. 2.22 The BLV levels adopted in the VUS for brownfield land are significantly higher than those adopted for greenfield land. However, no evidence is provided to show that a greenfield land owner would be prepared to release their land for a lower value than a brownfield land owner. 2.23 It is the express view of the representor that the BLVs utilised for greenfield land in particular are artificially low, and hence overstate viability (and the propensity to accommodate CIL liability on greenfield sites). The differential approach to greenfield and brownfield base land value assessment is regarded as unreasonable, un-evidenced and requiring amendment. External Works 2.24 An external works allowance at 10% of base construction cost is adopted within the VUS. The representor regards such an allowance as insufficient to cover standard costs of providing serviced development plots, with an allowance of 15% of base costs being necessary to reflect standard developer expectations. Garages 2.25 The VUS makes no reference to the cost of constructing garages, or the CIL charge which is generated by the total garage floor area within a scheme. The latter constitutes GIA, as measured for the purpose of CIL liability, and must be included. 2.26 The representor regards the omission of garages as a fundamental issue which unduly overstates the viability testing of sites across Basildon by both underestimating construction costs and the scale of CIL liability arising from the scheme typologies tested. 2.27 The representor regards it as essential that the VUS viability assessments are re-run with an appropriate provision and construction cost allowance for attached, detached and integral garages along with an appropriate assessment of CIL liability arising from provision of garages. Professional Fees 2.28 Professional fees are applied within the VUS at 8% of base build plus external works. The representor regards this allowance as insufficient, with professional fees also incurred on site abnormalities, opening up works and construction of garages. Viability modelling must take full account of the incurred development costs. 2.29 A 10% professional fees allowance is regarded as the minimum appropriate, in line with that adopted in the VUS for commercial development. Contingency 2.30 A contingency allowance is applied within the VUS at 4% of base build plus external works. The representor regards this allowance as insufficient, with a contingency allowance of 5% being widely accepted as reflecting developer's expectations when calculated on base build, external works, site abnormalities, opening up works and construction of garages. Build and Sales Rates and Development Time Periods 2.31 No information is provided on the development period applied to appraisal typologies within the VUS in respect of assumed build rates, sales rates or site preparation. Therefore, the cash flow periods are unclear, and clarity on this matter is essential to ensure appropriate modelling of development finance. It is important that the development period is realistic and market facing – particularly for larger sites, which will require significant site preparation and will involve both construction and sales over extended periods, with the construction period expected to mirror the sales period. Infrastructure Costs 2.32 The representor is promoting a major strategic development site at Land North of Southend Road, Shotgate, which is set out within Strategic Policy H13 of the Basildon Borough Revised Publication Local Plan as a potential development site. 2.33 BC identifies the site as having capacity to provide up to 280 homes, including 31% affordable housing. BC also identifies that the site will require significant infrastructure improvements in order to make the development acceptable in planning terms. 2.34 Improvements include: • Highways infrastructure: a contribution towards improvements to the local and strategic road network, including a new grade separated junction of the A127 at Pound Lane/Cranfield Park Road; • Community infrastructure: contributions towards early years childcare and primary school provision in the local area, to be achieved through the expansion of existing schools and a contribution towards the expansion of GP services within the Wickford area to serve the residents of the site, unless the NHS determine that on-site provision is required. 2.35 BC has not yet identified the full costs</p>

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					<p>associated with delivering the infrastructure (set out above) required to make development of the strategic site acceptable in planning terms. 2.36 It is noted that the cost of the grade separated junction is set out at £70m in the East Basildon High Level Development Framework document produced by Pell Frischmann in September 2017. 2.37 Only three strategic sites are tested within the VUS, with all other strategic sites being regarded as appropriately considered through the general (generic) typologies and the specific site viability assessment in the PBA Basildon Borough HELAA Viability Update Report (June 2017). 2.38 The adopted approach for testing of the majority of strategic sites is not regarded as appropriate, as policy costs/infrastructure improvement costs have been underestimated or ignored. 2.39 VUS Table 3.2 " <i>Viability Policy Matrix for the allocation policies in the Basildon Borough Council Draft Local Plan (at January 2018)</i>" includes no policies impacting upon the viability of the "H14 Land north of Shotgate" site, which is now designated "Policy H13 Land North of Southend Road, Shotgate" within the DLP. However, the DLP requires that the H13 site provides improvements as referenced in paragraph 2.37 above. 2.40 We understand that the H13 site is assessed in line with the generic site modelling on the basis of " <i>site opening up costs</i>" equating to £10,000 per unit to cover the costs of " <i>site service installations and strategic infrastructure</i> such as drainage, strategic landscaping, and public open space, etc." 2.41 As an example of the costs attributed to a strategic site which is required to contribute to the new grade separated junction of the A127, the H12 East Basildon Borough strategic site (now Policy H11: East of Basildon) is allocated total opening up costs of £30,562 per unit including £26,829 per unit in respect highways improvements. 2.42 It is essential that the cost of the grade separated junction is included within the assessment of the H13 site, with a significant uplift from the £10,000 per unit allowance likely to be required. Any such increase in costs will decrease the viability " <i>headroom</i>" for the assessment of an appropriate CIL charge. 2.43 The H11 strategic site is assessed at nil CIL charge within the VUS, whereas the H13 site is assessed at £230 psm. It is, therefore, regarded as essential to test the H13 site with an appropriate level of opening up costs. 2.44 The generic assumption for S106 costs which the VUS applies to most strategic sites equates to £3,230 per unit. In comparison, the H11 strategic site is assessed at £14,809 per unit. Other strategic sites are assessed at £16,408 per unit and £8,061 per unit. Therefore, the assumption adopted for the H13 site falls significantly below the rates adopted for other strategic sites. 2.45 Any underestimation of S106 costs within VUS appraisals will overstate the level of reported viability " <i>headroom</i>" for CIL, leading to an excessive rate of CIL liability. 2.46 In respect of infrastructure costs/S106, it is concluded: • The strategic development sites will be subject to a far greater cost burden than is currently incorporated within the viability appraisals within the VUS. This is a significant unknown quantity, and therefore forms an inadequate evidence base upon which to set the substantial CIL rate proposed. • BC has not presented a clear distinction in circumstances between how Section 106 planning obligations will continue to be sought, and the remit of CIL, following adoption and implementation. This is an inadequate basis upon which to take forward the PDCS to DCS stage, and ultimately Examination. 2.47 It is the representors' view that infrastructure required to mitigate the impact of delivery of strategic sites is most appropriately secured via Section 106 Agreement and such costs must be appropriately assessed with reference to site specific circumstances. A high level, very selective assessment of strategic site viability is not regarded as appropriate. Flats 2.48 DLP Policy H25 requires that 40% of 10+ unit developments comprise one and two bedroom homes and the VUS assumes 20% of units are 1 and 2 bed flats averaging 55 sq m. 2.49 VUS Paragraph 4.7 states " <i>... the average sales price of family homes (detached and semi-detached) dwellings in Basildon Borough is the third highest in this region. Conversely, terraced and flats compare relatively poorly with neighbouring areas.</i>" 2.50 VUS Paragraph 5.16 states " <i>Higher density sites are traditionally more likely to accommodate flats, although demand is currently at a low level in many locations. Whilst low density sites will have a much higher proportion of family dwellings.</i>" 2.51 The provision of 20% of total units as flats is regarded as a much higher than standard provision on standard family housing developments. 2.52 The VUS provides no commentary in respect of the impact upon the sales values of flats when delivered in significant numbers as part of a traditional housing scheme, and no opinion is expressed in respect of the anticipated sales rates for units which are stated to be in low demand. 2.53 The representor requests that the impact of DLP policies are fully reasoned and modelled with BP's viability testing, as the</p>

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					<p>generalised approach which is currently adopted does not appear to reflect the value and demand opinions expressed in the VUS. Other Matters Zero rated public authority funded development 2.54 No reasoning or viability support has been provided to show why BC set out in the CIL PDCS that residential development predominantly funded by a public authority should be zero rated. Further commentary will be provided upon provision of appropriate reasoning and methodology. Nominal Rates 2.55 BC propose to apply a "nominal CIL rate of £10 per square metre" to "All other uses". No consideration is given to this proposed CIL rate within the VUS and the representor regards this 'coverall' charge as non-compliant with CIL Regulations. Lack of Evidence of Viability for East Basildon Sites 2.56 The PDCS includes a charge of £50 psm for Basildon (excluding flatted development). Strategic site H11 was assessed at a nil CIL charge within the VUS (having been reallocated from the previous H11 allocation), but will now be subject to a £50 psm charge. 2.57 The VUS Addendum provides limited details of revised viability testing in respect of generic sites in East Basildon, replacing the previous H11 allocation. No appraisals or cashflows are provided to support and evidence the conclusions reached in the VUS Addendum, and as a result it is not possible to carry out appropriate due diligence or provide appropriate consultation responses. Regulation 123 List 2.58 BC has requested views on "specific infrastructure projects, or types of infrastructure that the Council should spend CIL receipts on". 2.59 PPG - CIL (paragraph 28) states the following: "It is good practice for charging authorities to also publish their draft infrastructure lists and proposed policy for the associated scaling back of section 106 agreements at this stage, in order to provide clarity about the extent of the financial burden that developments will be expected to bear so that viability can be robustly assessed. The list now forms part of the 'appropriate available evidence' for consideration at the examination." The representor regards the approach adopted by BC as inappropriate, and deviating from PPG. The testing of viability to assess the viable levels of CIL charges should include S106 allowances which take account of the draft infrastructure list. As currently assessed, S106 allowances have not been adjusted to reflect the extent of the financial burden that developments will be expected to bear so that viability can be robustly assessed. There is a danger that the assessed levels of S106 costs will be underestimated or overestimated, depending on the items which are adopted on the Regulation 123 list. 3. Conclusion 3.1 Due to the issues raised above, particularly in respect of: benchmark land values; insufficient external works; the lack of inclusion of garage accommodation; inappropriate strategic site opening up and S106 costs; and non-provision of sufficient appraisals and cashflow data, it is not possible to agree with the proposed differential rates of CIL charge across Basildon Borough, or the specific rates for flatted and residential development in the Basildon, Wickford and Billericay locations. 3.2 A reassessment of CIL is requested in line with revised appraisal assumptions and methodology outlined herein.</p>

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<a href="#">PDCS/71</a>	Miss Anna Davies	Taylor Wimpey	Mr James Brierley	Gerald Eve	<p>The CIL rate for Billericay is overestimated and unjustified by flawed evidence used to support it. The proposed rate does not sufficiently take into account appropriate costs required to deliver the site in accordance with other policies. The Billericay proposed CIL rate should be lowered to allow flexibility in meeting all other obligations and costs associated with delivering residential development - particularly relating to H17 - South West Billericay (SWB). Our assessment of the evidence base provided by Porter Planning Economics (PPE) to support the CIL rates specifically focused on land interests at SWB and noted several key issues which undermine the proposed CIL rate (as set out in Appendix 1 of this response). However, several issues identified within the evidence base relating to SWB appear to also be consistent across all the example appraisals provided. Therefore the evidence base supporting the residential CIL rates appears to be fundamentally flawed and cannot be relied upon to justify any of the proposed residential CIL rates. In Appendix 1 of this CIL response booklet we have set out detail of the issues with the PPE evidence base used to support the proposed CIL rates. However, we have summarised some of the key issues below: The proposed CIL relies upon evidence which is not available on the Council's website, resulting in the assessment lacking transparency. PPE indicate their work is a continuation of a PBA 2015 Report. However this PBA report does not appear to be available on the Basildon planning website or on the web page relating to the CIL. We were also unable to locate the Pell Frischmann's Basildon Borough HLDF Preliminary Abnormal Infrastructure report (2017) on which PPE have relied upon for several infrastructure costs relating to strategic sites. This lack of transparency inhibits reasonable interrogation of the evidence base. The CIL evidence base is inconsistent with the Draft Local Plan (DLP) (Oct 2018). In regard to SWB in the DLP, the evidence base wrongly identifies the site, tests the wrong level of homes to the DLP and is inconsistent in the applied assumptions to those set out in the PPE study - which in any event are questionable and out of date. Furthermore, the evidence base for Billericay is only supported by a single typology test in the example appraisals. Given that the Billericay example appraisal uses inconsistent assumptions to that set out in the PPE Study text, all of the appraisals undertaken in the study must be made available to the public for scrutiny before the CIL rate can be demonstrated as reasonable. The data sets relating to sale value used by PPE in the CIL evidence based rely upon 2014-2016 indexed data which has not been cross checked with any recent sales evidence to confirm the assumptions are accurate. Such data must be updated prior to the release of the next CIL draft charging schedule to ensure the evidence base is robust. The issue of up to date and accurate data is also applicable to constructions costs -including those for S106 items and site delivery. Furthermore a serious issue with the proposed cash-flow was identified in the example appraisal of SWB. The proposed cashflow assumes houses are sold on the same date that land is purchased, and the infrastructure works are undertaken; and construction of the properties commence! Effectively an unrealistic cashflow has been applied which results in the appraisal being more viable than is possible. This is because the appraisal assumes that scheme revenue is received before it would be possible to complete construction which is illogical. This flaw appears to go a long way to explain why the CIL proposed for Billericay is such an anomaly when compared to other proposed rates in Basildon, Essex or even the UK. Only CIL rates in zone one of central London are higher than that proposed for Billericay which is illogical. Please see Appendix 1 attached for further examination of the CIL.</p>

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<a href="#">PDCS/76</a>	Miss Paige Harris	Planner Persimmon Homes			<p><b>Basildon Borough Council Community Infrastructure Levy: Preliminary Draft Charging Schedule 2018</b></p> <p>Persimmon Homes welcomes the opportunity to comment on Basildon's Community Infrastructure Levy: Preliminary Draft Charging Schedule 2018 (Oct 2018) together with the associated evidence base. Basildon Borough Council is consulting on their Draft Charging Schedule which seeks to set out the Community Infrastructure Levy (CIL) in line with Regulation 15 of the CIL Regulations 2010 (as amended). The date of approval and date of effect of the CIL are yet to be confirmed. Lack of robust evidence published evidence supporting this consultation comprises; - Basildon Local Plan and CIL Viability Update Study Final Report February 2018 - Basildon Local Plan and CIL Viability Update Study – addendum – further viability advice and clarification for Basildon Council It is also relevant to consider; - Basildon Borough Local Plan – Infrastructure Delivery Plan (IDP), October 2018 Persimmon Homes are concerned that the Infrastructure Delivery Plan (IDP) and other evidence supporting the draft Local Plan and the CIL work does not provide sufficient detail regarding what, where, when and how infrastructure will be funded. It is recognised that CIL is just one possible funding source towards infrastructure needed to support development in the Local Plan. When a charging authority introduces the Community Infrastructure Levy, Section 106 requirements should be scaled back to those matters that are directly related to a specific site, and are not set out in a Regulation 123 list. However, the Council has not published the set of items they intend to fund via CIL by way of a draft Regulation 123 list or clarified what will be funded via s106. Therefore, it is unclear at this stage; (A) what infrastructure is proposed to be supported via the Basildon CIL; (B) What infrastructure is proposed to be supported via s106 obligations; (C) There does not appear to be a fully costed infrastructure list (D) There does not appear to be clarity over the timing of infrastructure delivery (E) There does not appear to be clarity over which sites have specific infrastructure requirements and the costings As detailed in Persimmon Homes' representations to the Local Plan (Dec 2018), the viability assessment supporting the draft Local Plan and the CIL does not have regard to the full costs of infrastructure and compliance with policies in the draft plan. The viability assessment undertaken on behalf of the Council includes some additional costs that would result from the implementation of the Plan across a range of geographies and development scenarios. However; - the potential cost of the Recreation Avoidance and Mitigation Strategy (RAMS) has not been fully considered in the 'Basildon Local Plan and CIL Viability Update Study' (Feb 2018) - Dear Sir / Madam, Basildon Borough Council Community Infrastructure Levy: Preliminary Draft Charging Schedule 2018 Persimmon Homes welcomes the opportunity to comment on Basildon's Community Infrastructure Levy: Preliminary Draft Charging Schedule 2018 (Oct 2018) together with the associated evidence base. Basildon Borough Council is consulting on their Draft Charging Schedule which seeks to set out the Community Infrastructure Levy (CIL) in line with Regulation 15 of the CIL Regulations 2010 (as amended). The date of approval and date of effect of the CIL are yet to be confirmed. 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					<p>and the CIL does not have regard to the full costs of infrastructure and compliance with policies in the draft plan. The viability assessment undertaken on behalf of the Council includes some additional costs that would result from the implementation of the Plan across a range of geographies and development scenarios. However; -the potential cost of the Recreation Avoidance and Mitigation Strategy (RAMS) has not been fully considered in the 'Basildon Local Plan and CIL Viability Update Study' (Feb 2018) -The cost assumed for school places (p52 'Basildon Local Plan and CIL Viability Update Study') are derived from 2016 costs which do not include indexation which ECC applies from the baseline date. It is also understood from ECC that these figures for school places are being revised upwards. -The 'Basildon Local Plan and CIL Viability Update Study' does not appear to include costs of Local Plan Policy requirements including; -Electric charging points -DES5 High Quality Landscaping and Public Realm Design -Costs associated with the delivery of infrastructure identified in the IDP (It is unclear what comprise the infrastructure funded by CIL in the absence of a 123 list and what falls to s106). -The 'Basildon Local Plan and CIL Viability Update Study' refers to s106 costs of £3,230 per dwelling, however for the majority of the strategic sites the s106 costs are likely to be far in excess of this given that they are being asked to forward fund major infrastructure. -It remains unclear from the Infrastructure Delivery Plan what infrastructure costs are being sought from which strategic sites. The Viability Study appears deeply flawed and has not adequately had regard to and tested the burden being placed on development, in part because of the inadequacies of the Infrastructure Delivery Plan. The Council need to address this. A balance needs to be struck between the desirability of CIL funding of infrastructure and the effect that the imposition of CIL will have on development. A balance can only be properly struck if the charging authority has clear and robust evidence on the level of infrastructure cost / policy costs and the effect that particular levels of CIL will have on development viability (which will impact the level of development likely to be brought forward). In this instance, the Council do not have clear and robust evidence about infrastructure costs and policy costs (including s106 costs), and the cumulative impact that this will have on development viability. The modelling undertaken is therefore deeply inadequate and fails to understand or cost the full infrastructure costs associated with developments, partly because of the lack of an adequate infrastructure delivery plan. Furthermore, it is not clear what the programs for delivering developments are in the absence of a housing trajectory in the draft Local Plan. It also needs to be borne in mind that strategic sites often have a different 'risk profile' as they often span economic cycles, bear heavier infrastructure burdens and have significant on-costs. This does not appear to be modelled. An important component of the balance is to understand effects of the proposed CIL level on the viability of development as a whole. We consider that the proposed CIL rates, s106 and policy requirements of the Local Plan (including affordable housing) will render development unviable. This endangers the delivery of the Local Plan, with the corresponding negative socio-economic impacts. Section 3 – CIL Rates The charging authority is seeking to differentiate by use and by area. Doing so requires the Council to produce clear and cogent justification that shows that there are genuine differences in use between the uses in different charging bands, and that there are viability justifications for the differentiations, both by use and by area. The CLG guidance on CIL makes clear that, as a matter of policy, this requires fine grained evidence. As a matter of law there has to be a clear justification for differentiation, failing which there is a real risk that the differential charges will operate as a state aid. This puts an evidential burden on the charging authority. Persimmon Homes objects to the CIL rates stated within the schedule. As detailed above, the evidence submitted to date is not robust and lacks necessary clarity. Notwithstanding this, CIL rates are disproportionately high taking account of the location of the Borough and economic composition of the major towns where the highest rates are being charged. The high nature of these charge rates are increasing the risk of a lack of delivery of essential infrastructure, resulting in the reversal of what the Infrastructure Delivery Plan and the CIL Charging Schedule sets out to achieve. The increased burden on developers to pay up to £350 a square metre for residential development will significantly impact upon a development's viability rendering it unviable and therefore unable to be delivered. It is understood that development must contribute to infrastructure that supports it however if the costs for this set by the Council are too great then the Local Plan will not deliver the planned level of growth. It is suggested that the Council needs to review its evidence base, produce a clear IDP and financial justification for these rates and re-consult.</p>

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					<p>Conclusion There is a lack of clear and robust evidence to support the proposed CIL rates. This consultation appears premature and has failed to provide clear and cogent justification. The draft rates are unjustifiably high and there is a lack of robust evidence as to what CIL will fund and the cumulative impact of the charge rates, s106 contributions and policy requirements on overall development viability. These charging rates together with other policy and s106 costs are likely to make development unviable and would therefore threaten the delivery of the Local Plan and the socio-economic benefits arising. The Council need to correct the significant deficiencies in its evidence base and revisit the proposed CIL levels ahead of the submission of the Local Plan and the submission of the CIL schedule for examination.</p>
<a href="#">PDCS/80</a>	Countryside Properties (UK) Ltd	Countryside Properties (UK) Ltd	Mr Kevin Coleman	Director Phase 2 Planning & Development	<p>We note that at paragraph 5.54 of the February 2018 Viability Update Study by PPE, reference is made to an element of the costs arising from the relocation of sports pitches from Gardiners Lane being assigned to the three strategic sites that were tested as part of the PPE report (Gardiners Lane itself, SW Billericay, and East Basildon). It is not clear, however, from the document what level of cost has been applied, nor whether or not the assumed cost has first been discounted to take account of revenue to be generated by the redevelopment of the Gardiners Lane site itself. In line with our representations on the Pre-Submission Draft Local Plan, the relocation of the Gardiners Lane sports pitches is part of a wider programme of improving the quality and accessibility of strategic playing pitch provision for the District as a whole. As such, we would consider that any remaining cost of relocation once receipts of disposal have been taken in to account should be part of the overall CIL Regulation 123 list, and funded through CIL, rather than an additional s106 cost for the strategic sites alone.</p>

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<a href="#">PDCS/81</a>		Gleeson Homes and Gladedale	Mr Kevin Coleman	Director Phase 2 Planning & Development	<p>Our primary concern at this stage is whether or not the assessment methodology has properly taken in to account development costs, and in particular s106 costs. The 2018 PPE report uses as a basis for s106 costs the figure of £2,330 per unit originally set out in the 2015 PBA Report. However, the 2015 PBA report, as well as being somewhat out of date, never itself properly explained or justified that figure. Although we note that the 2015 PBA report is no longer appearing on the Council's evidence base (which it should do if it is still being relied upon), Paragraph 7.2.3 of that document explained that little evidence had been obtained to verify that figure, and moreover that for larger sites, the figure may well be higher. The latter point is of particular relevance because the methodology that produced the figure of £2,330 per unit was based only on an estimate of average s106 costs for schemes of over 10 units, and thus as smaller schemes often do not attract the full range of s106 costs, it is almost certainly the case that the average on larger schemes would be higher. Moreover it is not clear whether or not the figure of £2,330 ever included contributions to off-site strategic highway works, which will be a significant infrastructure matter for residential development in the new Local Plan. Table 5.11 of the 2018 PPE report shows that the cost of highway infrastructure can not only be significant, but can vary widely between different strategic sites based on their particular circumstances. It is not therefore readily possible to provide an aggregate s106 contribution level to cover highways, unless all strategic infrastructure is to be provided through CIL rather than through individual s106s. Paragraph 5.58 of the 2018 PPE report notes that the means of funding for strategic infrastructure (CIL or s106) has not yet been determined, but it is important to know before the CIL rate is set. As far as we are aware, the only adjustment that has been made to update the PBA figure is the inclusion of an allowance for RAMS (Recreational Avoidance) at £1000 per unit. This figure is likely to be an over-estimate of the RAMS requirement, but that does not offset our concerns regarding the lack of evidence to support the original £2,330 figure, particularly for larger sites, or the lack of accounting for the true cost of highways mitigation. At this stage, therefore, we are unable to support the residential rates, because we do not as yet consider that the full development cost has been considered. We would suggest that a separate piece of work on average s106 contributions, broken down by different site size categories, is needed, and in addition it will be important to properly factor in the costs of highway mitigation (and decide what highway works will be CIL/Regulation 123), before the rate is set.</p>

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<a href="#">PDCS/82</a>		Pigeon (Wickford) Ltd	Mr Richard Clews		<p>AN OBJECTION IS SUBMITTED TO THE CIL RATES PROPOSED FOR RESIDENTIAL DEVELOPMENT (C3), IN PARTICULAR IN RELATION TO RESIDENTIAL DEVELOPMENT IN WICKFORD.</p> <p>We are instructed by Pigeon (Wickford) Limited and landowners in relation to Basildon Borough Council's Community Infrastructure Levy ('CIL') Preliminary Draft Charging Schedule ('PDCS') consultation issued in accordance with CIL regulation 15. The PDCS relies upon an evidence base provided in the form of a viability study prepared by Porter Planning Economics ('PPE') which asserts that developments in the Wickford area are able to viably absorb a CIL rate of £230 per square metre, in addition to other Local Plan policies, including affordable housing. Our review of this evidence base indicates that it significantly overstates the capacity of large developments to absorb additional contributions towards community infrastructure through CIL.</p> <p>BNP Paribas Real Estate has significant experience in advising on viable CIL rates for circa 80 charging authorities across England, all of which have been examined and found sound. We are a leading firm advising on the viability of Local Plan policies, standard charges and the viability of application schemes.</p> <p>We have reviewed the evidence base that informs the proposed CIL PDCS and we set out our observations on the PPE viability study under the headings below.</p> <p>1. Market Housing Sales Values</p> <p>For viability testing in Wickford, PPE has adopted a blended sales value for the market housing units of £4,300 per sq/m for houses and £3,800 per sq/m for flats. It is unclear why the value adopted for the houses is higher than the flats as we would usually expect flats to generate a higher value per sq/m. We note that the sales values for the houses adopted by PPE for testing West Basildon and Billericay are lower than the flattened values in these locations whilst Basildon Town has the same value of £3,500 for both flats and houses.</p> <p>The values for the units appear to derive from an analysis of sales from the Land Registry</p>

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					<p>database dating from January 2014 to June 2016 and the sales values have been indexed from the date of sale to November 2017. It is unclear why PPE has not had regard to more recent sales (post June 2016) in order to determine blended values as at November 2017. PPE has indexed the sales values having regard to the Land Registry House Price Index rebased to Basildon. However, the PPE report states that values in Billericay are substantially higher than those in the rest of the borough, consequently, it is unclear whether the borough wide house price index accurately reflects the movement in values in Wickford to November 2017.</p> <p>We have reviewed the sales evidence relied upon by PPE in addition to undertaking further research regarding recent sales and we have identified sales of properties transacted between 2014 and 2016 in the PPE report which have subsequently transacted in 2017 and 2018. We summarise these sales in Table 1 and provide a comparison against the indexed values PPE have provided in their report.</p> <p>Note: Table 1 inserted in this space, available on attached pdf</p> <p>It is clear from the table above that the indexed sales values that inform the values for Wickford in the PPE report are overstated which distorts their proposed CIL rates.</p> <p>2. External Works</p> <p>PPE has adopted a cost for external works at 10% of the base construction costs. In our experience, we would expect this sum to represent 15% of the base costs. We highlight that PPE have adopted 15% for external works for the purpose of their commercial viability testing and subsequently it is unclear why this cost is not consistent between the residential and commercial testing.</p> <p>3. Contingency</p> <p>PPE have adopted a construction cost contingency of 4% and we would expect the</p>

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					<p>contingency sum to be 5%. Consequently, this has the effect of understating the construction costs.</p> <p>4. Professional Fees</p> <p>PPE has adopted professional fees of 8% of construction costs and for the testing of a broad range of typologies we consider that fees of 10% – 12% would be more appropriate. We highlight that PPE has adopted 10% professional fees for the purpose of their commercial viability testing and subsequently it is unclear why this cost is not consistent between the residential and commercial testing.</p> <p>5. Affordable Housing Sales Legal Fee</p> <p>We note that the PPE appraisals do not include a sales legal fee for the affordable housing and this should be included as a cost in their assessment.</p> <p>6. Finance Costs</p> <p>PPE has adopted a finance rate of 6.5% for the residential testing whilst they have adopted a finance rate of 7% for the commercial viability testing. It is unclear why the finance rate is not consistent between the residential and commercial testing. We would typically expect that the finance rate would be 7%. As a result, the finance costs are understated.</p> <p>7. Methodology – Appraisal Analysis</p> <p>The PPE report provides a sample of 4 appraisal summaries of 4 residential typologies ranging from 20 units to 2,000 units. Unfortunately, PPE have not provided an appraisal of a scheme in Wickford.</p> <p>We note from all the appraisal summaries that site purchase occurs for each of the site in January 2017, construction starts on site immediately (January 2017) and sales revenue commences in July 2017.</p> <p>We consider that this timing is wholly unrealistic as each project would require a suitable</p>

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					<p>lead in period for pre-construction before construction commences. Whilst construction commences in January 2017, each appraisal also assumes that sales commence and revenue is received on a monthly basis from July 2017 which is 6 months following site acquisition.</p> <p>Rather than comment upon each of the 4 appraisal summaries individually we have considered the appraisal for site H18 (SW Billericay) comprising 2,000 units in further detail and we summarise the assumed project programme in Table 2.</p> <p>Table 2: Site H18 – Project Programme</p> <p>It is unclear why the appraisal model assumes that the site is acquired over a 75-month duration commencing in January 2017 and ending in May 2023 as the residual land value should reflect site acquisition in January 2017 and continue across the entire development period. We note that a similar issue is repeated on the smaller developments.</p> <p>Consequently, the model stops applying finance costs to the residual land value long before the scheme has returned a positive cashflow. This in turn will significantly understate finance costs which will distort the capacity of the scheme to absorb CIL contributions.</p> <p>As stated above, we consider that it is an unreasonable assumption to commence construction onsite immediately as a scheme of this scale would require at the least a 6 month pre-construction period.</p> <p>It is also overly optimistic to model sales receipts 6 months after site acquisition as the scheme would need to be progressed to a point where it is capable of constructing and disposing of c. 13 units per month. We would expect sales for a scheme of this scale to commence at the very minimum of 12 months into the construction programme.</p> <p>We consider that the project assumptions adopted by PPE serve to depress the scheme</p>

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					<p>finance costs which in turn inflates the residual land values which they rely upon to support the high suggested CIL rates in their report.</p> <p>As a comparison we have replicated the PPE appraisal within Argus Developer and we have adopted the same revenues, costs and project timings. We attach as Appendix 1 a copy of our appraisal and we summarise in Table 3 a comparison between the outputs of our appraisal and the PPE appraisal.</p> <p>Table 3: Comparison of Appraisals (PPE Assumptions)</p> <p>In summary, our appraisal (adopting the same assumptions as PPE) generates a residual land value of c. £139.74m which is c. £28.93m lower than PPE's residual land value. Our appraisal demonstrates that the PPE appraisal does not appear to calculate interest costs correctly.</p> <p>We have also undertaken an appraisal which adopts assumptions that we consider are more realistic for a scheme of this scale than those adopted by PPE with regards to construction and the commencement of sales. In summary, we have adopted a preconstruction period of 6 months and assumed that sales would commence 12 months into construction. The appraisal is attached as Appendix 2.</p> <p>Whilst we make reference to the appraisal for site H18 in particular, we reiterate that all of the appraisal summaries attached to the PPE report adopt the same assumptions with regards to construction commencement and sales and we assume that the same assumptions carry through to all of the typologies (including Wickford) set out in this report.</p> <p>We summarise in Table 4 the results of our amended appraisal compared to the PPE appraisal.</p> <p>Table 4: Comparison of Appraisals (BNPPRE Project Programme Assumptions)</p> <p>In summary, our appraisal (adopting 6 months pre-construction and sales commencing 12</p>

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					<p>months into construction) generates a residual land value of c. £124.30m which is c. £44.37m lower than PPE's residual land value.</p> <p>We have also highlighted above appraisal assumptions adopted by PPE that we do not agree with and for the purpose of this letter we made the following adjustments to the appraisal inputs in Table 4:</p> <p>§ Reduced sales values by 10%;</p> <p>§ 15% for external works;</p> <p>§ Professional fees at 10%;</p> <p>§ 7% finance rate;</p> <p>§ 5% contingency;</p> <p>§ Sales legal fee for the affordable housing at 0.5% of GDV.</p> <p>Whilst we have reduced the sales values by 10% in our appraisal of site H18 which is located in Basildon, our review of the sales values related to the Wickford area indicates that a more significant reduction below PPE's values is required. However, we have modelled a reduction in sales values of 10% to demonstrate the impact this has on the appraisal and the residual land value.</p> <p>We also note that the appraisal for H18 does not appear to include a cost of £17,000 per unit as set out in the PPE report as Greenfield site opening costs. We have included this</p>

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					<p>cost of £34m in our appraisal.</p> <p>We summarise in Table 5 our appraisal results compared to the PPE appraisal. The appraisal is attached as Appendix 3.</p> <p>Table 5: Comparison of Appraisals (BNPPRE Project Programme Assumptions and amended appraisal inputs)</p> <p>In summary, our appraisal (adopting 6 months pre-construction and sales commencing 12 months into construction and alternative inputs) generates a residual land value of c. £61.06m which is c. £107.61 lower than PPE's residual land value.</p> <p>In conclusion, on the basis of our review of the PPE report and subsequent analysis of one of their appraisal models we consider that the proposed CIL rates are potentially significantly overstated. At the very least, the proposed CIL rates are set at the very margins of viability and do not reflect in the requirement at Paragraph 19 of the CIL section of the Planning Practice Guidance to ensure that a 'buffer' or margin is included so that the CIL rate remains viable if economic circumstances change. If the CIL rate is set at the margins of viability, the inevitable consequence is a reduction in the level of affordable housing that can be sustained, or a requirement for a trade-off against other Local Plan requirements.</p> <p>We have reviewed the evidence base that informs the adopted market housing values for Wickford and it is clear from our research that the PPE indexed values are overstated when regard is had to actual market evidence. Whilst we have not been in a position to assess and re-appraise a typology in Wickford (as one was not attached as an Appendix to the PPE report) we have tested a 2,000-unit scheme. We have concerns with regards to the project programme that underpins this appraisal which serves to depress the finance costs and artificially inflates the residual land value which has led to the high proposed CIL rate of £230 per sq/m.</p>

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					<p>The PPE report suggests at Table 6.1 that developments in Wickford would have maximum CIL rates (before headroom or 'buffer') for a 1,000-unit site ranging from £593 to £870 per square metre, depending on the extent of other Local Plan polices required. It is presumably on the basis of this supposed headroom that the CIL rate of £230 per square metre has been recommended. However, as our amendments to the appraisals indicate, the residual values are overstated by 276%. Our appraisals indicate that the 'surplus' value available to fund CIL is likely to be as low as £42.40 per square metre, as set out in Table 6.</p> <p>Table 6: 'Surplus' value available to fund CIL in Wickford (based on 2,000-unit scheme typology)</p> <p>This assumes that the Council's requirement for on-site Section 106 obligations is limited to £7,437 per square metre (as incorporated in the PPE assessments). We have concerns regarding the adequacy of this amount in relation to our client's site. Any additional requirements would eliminate the modest surplus value that our assessment indicates might be available.</p> <p>Prior to issuing its Draft Charging Schedule in accordance with CIL regulation 16, we would urge the Council to re-consider the evidence base for Wickford which, as set out above, significantly overstates that capacity of developments in this location to absorb the proposed CIL rates.</p> <p>Proceeding without changes to the rate for this area would put development at serious risk or significantly affect the ability of developments to meet the Council's other Local Plan requirements, including affordable housing.</p>
<a href="#">PDCS/83</a>		Estate and Agency Strategic Land LLP	Mr Luke Challenger	Associate ICENI Projects	We note that the emerging Community Infrastructure Levy (CIL) for Basildon has not yet advanced to the stage where infrastructure provision has been apportioned between the Section 106 and CIL routes. As such we reserve our position to comment on the planned list of infrastructure items when the CIL Section 123 list is published.

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<a href="#">PDCS/84</a>		BDW Eastern Counties	Mrs Lauren Patel	Barton Willmore LLP	<p>1.0 INTRODUCTION 1.1 These representations to the Community Infrastructure Levy ("CIL") Preliminary Draft Charging Schedule ("PDCS") dated October 2018 and supporting evidence base in the form of the Basildon Local Plan and CIL Viability Update Study ("VS") dated February 2018 and the Basildon Borough Local Plan - Infrastructure Delivery Plan ("IDP") dated October 2018 are submitted on behalf of Barratt David Wilson Homes Eastern Counties ("BDW Homes"), who are promoting the Land off Southend Road, Billericay ("the Site") for residential development. The Site is allocated for development for 190 residential units in the Revised Publication Draft Local Plan ("RPDLP") under Policy H20. Separate representations are made to the RPDLP. 22099/A5/LP Page 2 December 2018 2.0 RESPONSE TO THE DRAFT CHARGING SCHEDULE CIL Rates 2.1 The PDCS sets out the following proposed CIL rates: (See Table for above in attached letter) 2.2 As the table indicates, the rates for Billericay are proposed to be set at £350 per sq.m which is in our view exceptionally high and considerable higher than other areas within Basildon Borough administrative area. Rates for Wickford are lower at £230 per sq.m and in Basildon rates range between £10 per sq.m for flatted development and £50 per sq.m for other residential development. 2.3 As set out in the RPDLP, Billericay is expected to take a significant proportion of the required new residential development of the Local Plan period (3,034 homes representing around 25% of overall housing provision). It is appreciated that new infrastructure is required to be funded to cater for the growth, however such excessive CIL rates could stifle the viability of development and subsequently have a detrimental impact on delivery. 2.4 The IDP sets out details of the infrastructure needs to cater for the anticipated additional growth within Billericay. These are summarised as follows: • Waste Water: Potential requirement to upgrade the existing treatment facility • Additional Surface Water Management: £400,000 • Healthcare: Contribution towards increasing capacity for local primary care facilities, by means of an extension or possible new build and relocation of an existing practice (cost estimated at £1.2m) • Education: Expanded Brightside Primary School and new primary school on allocated site (cost estimated at £13.6m), plus contributions to early years education. • Traffic / Highways: B11-13 junction improvements identified. • Railway Upgrades: No specific requirements for Billericay but upgrades expected in the Borough as a whole. • Open Space / Outdoor Sports: Requirements for 58ha of additional open space and 11ha of outdoor sports provision. • Superfast Broadband • Emergency Services 2.5 Section 5 of RPDLP Policy H20 and supporting text paragraph 11.178 notes that the Site will require community infrastructure provision to support the level of growth proposed. It sets out at Paragraph 11.178 that: "There will be a requirement for contributions towards early years childcare and primary school provision in the local area. The site will also impact on the demand for GP provision within the area and the NHS have a strategy of expanding provision to accommodate growth at existing surgeries. There will therefore be a requirement for a contribution towards the expansion of GP services within the Billericay area to serve the residents of the site, unless the NHS determine that on-site provision is required." 2.6 In terms of healthcare, BDW is supportive of the need to ensure the development contributes towards meeting the healthcare provision associated with the level of growth proposed. With reference to the IDP, this notes that the Clinical Commissioning Group (CCG) responsible for planning local healthcare services indicate that contributions towards increasing capacity for local primary care facilities, by means of extension or possible new build and relocation of an existing practice (see Table 3) is required for Billericay as a whole. Across the 8 strategic site allocations in Billericay Paragraph 6.2.2 of the IDP expects 7,800 new residents to be created requiring additional floorspace of 535m2 at a cost of £2,300 per square metre, totalling £1.2m. Assuming 190 homes at site H20 generates 456 residents (based on 2.4 persons per household in accordance with the 2016 household projections) then a proportionate contribution of £69,768 would be expected (based on £153 per person). 2.7 In terms of education, the IDP sets out a need for an expanded Brightside Primary School and new primary school in Billericay to cater for projected growth. At paragraph 7.1.4 it sets out that this is planned on an allocated 2.9 ha site to the south west of Billericay. The cost of both the expansion and new school combined is indicated at Table 4 and is estimated at £13.6m. Assuming the same proportion of Billericay's planned growth is generated from the Site (456 of 7,800 new residents) and assuming all units quality as a worst case scenario, a proportionate contribution of approximately £80,000 would be required. 2.8 In terms of early years education, paragraph 7.1.23 sets out a need for 253 early years places from planned new development in the area. 7.2.5 of</p>

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					<p>the IDP advises this is considered on a site-by-site basis, and states that generally the cost of expansion of existing facilities costs £13,500 per place and £19,014 per place for a new facility. Paragraph 7.1.20 references the Essex County Council Developer's Guide to Infrastructure which determines how the need for Early Years provision is assessed and sets out a general rule of 0.09 Early Years place per dwelling or 9 per 100 new qualifying homes. Whilst unlikely, to assess the worst-case scenario, assuming all 190 homes on the Site H20 quality, this would generate 17.1 early years places and a contribution of £325,139 towards a new build facility or £230,850 towards upgrading an existing. Paragraph 7.3.1 sets out that funding would be from S106 or CIL. 2.9 In terms of surface water management, using the same proportionate calculation of the site catering for 456 new residents against an overall 7,800 in Billericay, a contribution of £23,384 would be required. 2.10 In terms of open space, the IDP incorrectly refers to the site as Policy H21 at paragraph 10.1.11. This should be amended. Here it sets out that the development of 190 homes at the Site would generate a need for 2.6 ha of open space to support the development. Taking into account existing deficiencies in Billericay, 4ha of open space; 2.8ha of amenity green space and 1.2 ha of Urban Park and Garden would be required. In addition, 0.7 ha of outdoor sports provision. It is expected that a significant proportion of open space will be provided on-site. Some limited contributions to address any deficiencies may be required in addition. 2.11 In summary, we can quantify using the IDP the likely contributions towards surface water management, healthcare, primary and early years education to be approximately £498,000 assuming all 190 units are qualifying and that the higher contribution to early years education as a worst-case scenario. Further contributions towards waste water, traffic and highways, public transport, broadband, emergency services and open space / outdoor sport (deficiencies only) cannot be quantified at this stage. 2.12 In comparison, at an exceptionally high CIL rate of £350 per sq.m we can carry out a notional exercise to establish what might be required as a CIL contribution from Policy H20. At 35 dwellings per hectare, we would expect the 190 dwellings to average approximately 80m2 per dwelling. This would generate an overall floor area of 15,200m2 which at 350 per sq. m would require a £5,320,000 CIL contribution. Similarly, to our calculation of what the IDP requires, we have assumed a worst case scenario that all units are qualifying. 2.13 It is evident that whilst some of the infrastructure requirements set out in the IDP are not yet quantified, it is unlikely that even if they were, they would bridge the enormous difference between the £498,000 and the £5.3m figures. The CIL rate is therefore in our view, excessive to the point it is likely to deem development unviable and stifle development from coming forward in Billericay if adopted. The RPDLP sets out that there remains unmet need within the Borough, and setting excessive CIL rates is only likely to exacerbate that problem further. Infrastructure Regulation 123 2.14 The PDCS does not appear to be accompanied by a published Regulation 123 list setting out which, if any, infrastructure projects are expected to be funded outside of CIL. It is therefore not clear which projects set out in the IDP are expected to be funded by CIL and which, if any, are not. We would expect a Regulation 123 to be prepared. Exceptional Relief 2.15 The PDCS does not expressly provide for exceptional relief, as per Regulation 55-57. There is therefore no avenue open to developers to reduce the level of contribution through the viability route. This is regrettable and could have a similar effect of stifling development, particularly given the excessively high CIL rates proposed for Billericay. We would urge that the allowance for Exceptional Relief is included to provide flexibility to allow development to come forward should this route be appropriate. Payments in Kind 2.16 We are pleased to see inclusion of allowance for Payments in Kind at section 5 of the PDCS. We reserve the right to comment further on the detail of this matter at a later stage. Draft Instalments Policy 2.17 We are pleased to see inclusion of allowance for phased payments at Appendix A of the PDCS. We reserve the right to comment further on the detail of this matter at a later stage. 3.0 REVIEW OF EVIDENCE BASE Infrastructure Delivery Plan (IDP) 3.1 The RPDLP is supported by evidence set out in the IDP of October 2018. We have made several comments in relation to this document in preceding chapters of this report. Viability Appraisal 3.2 We set out our comments in respect of the Basildon Local Plan and CIL Viability Update Study Final Report dated February 2018. This report forms part of the evidence base in respect of the Revised Publication Local Plan and to inform the setting of its CIL rates. 3.3 The methodology is generally considered reasonable in light of statutory requirements and prevailing local plan assessment best practice. 3.4 Area wide viability studies are by their very nature strategic, and unable to reflect</p>

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					<p>the economics of site-specific assessments. General concerns exist over the presented evidence base in respect of robustness and transparency of the evidence base which informs the residential benchmark land values for residential sites without planning. 3.5 The evidence base underpinning the study does not comply with CIL guidance, nor has it followed principles set out in the Royal Institution of Chartered Surveyors (RICS) Financial Viability in Planning Guidance Note (94/2012) insofar as this is an evidence based process and there is a requirement to set out the evidence to which an assessor has had regard in forming their opinion. It does not accord with the requirements set out in National Planning Guidance 1 which outlines a requirement for a transparent and sufficient evidence base. 3.6 In looking at Table 5.18 and the land values collated in Appendix 5 it is unclear how the land values adopted for Billericay tie-back to the transactions, as there is no attempt to analyse and weight the transaction upon which they rely. 1Paragraph: 010 Reference ID: 10-010-20180724 3.7 We are of the opinion the Charging Authority has not sufficiently tested the proposed levy rates in current market conditions, nor acted transparently in presenting their evidence base. 4.0 CONCLUSIONS 4.1 These representations are made on behalf of BDW Homes in response to Basildon Borough Council's consultation on their PDCS. In summary we would suggest:</p> <ul style="list-style-type: none"> <li>• The overall CIL rate of £350 per sq.m for Billericay is excessive and should be reconsidered. At such a high rate it is likely to have the effect of stifling development.</li> <li>• The excessively high CIL rate of £350 per sq.m for Billericay does not reflect the infrastructure needs to cater for anticipated growth set out in the IDP.</li> <li>• It is unclear as to what the proposed CIL rates cover as there is a lack of Regulation 123 List. This should properly be prepared and released for consultation to enable greater transparency and clarity.</li> <li>• The CIL Charging Schedule should allow for Exceptional Relief in accordance with Regulation 55-57. A lack of flexibility will also have the impact of stifling development.</li> <li>• Concerns raised over the supporting evidence base and Viability Study should be addressed.</li> </ul> <p>4.2 In summary, we would urge the Council to consider these representations prior to release of the next stage of the CIL consultation.</p>

ID	Full Name	Organisation Details	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/85</a>	Scott Properties	Scott Properties			<p>The CIL rate for Billericay is overestimated and unjustified by flawed evidence used to support it. The proposed rate does not sufficiently take into account appropriate costs required to deliver the site in accordance with other policies. The Billericay proposed CIL rate should be lowered to allow flexibility in meeting all other obligations and costs associated with delivering residential development - particularly relating to H17 - South West Billericay (SWB). Our assessment of the evidence base provided by Porter Planning Economics (PPE) to support the CIL rates specifically focused on land interests at SWB and noted several key issues which undermine the proposed CIL rate (as set out in Appendix 1 of this response). However, several issues identified within the evidence base relating to SWB appear to also be consistent across all the example appraisals provided. Therefore the evidence base supporting the residential CIL rates appears to be fundamentally flawed and cannot be relied upon to justify any of the proposed residential CIL rates. In Appendix 1 of this CIL response booklet we have set out detail of the issues with the PPE evidence base used to support the proposed CIL rates. However, we have summarised some of the key issues below: The proposed CIL relies upon evidence which is not available on the Council's website, resulting in the assessment lacking transparency. PPE indicate their work is a continuation of a PBA 2015 Report. However this PBA report does not appear to be available on the Basildon planning website or on the web page relating to the CIL. We were also unable to locate the Pell Frischmann's Basildon Borough HLDF Preliminary Abnormal Infrastructure report (2017) on which PPE have relied upon for several infrastructure costs relating to strategic sites. This lack of transparency inhibits reasonable interrogation of the evidence base. The CIL evidence base is inconsistent with the Draft Local Plan (DLP) (Oct 2018). In regard to SWB in the DLP, the evidence base wrongly identifies the site, tests the wrong level of homes to the DLP and is inconsistent in the applied assumptions to those set out in the PPE study - which in any event are questionable and out of date. Furthermore, the evidence base for Billericay is only supported by a single typology test in the example appraisals. Given that the Billericay example appraisal uses inconsistent assumptions to that set out in the PPE Study text, all of the appraisals undertaken in the study must be made available to the public for scrutiny before the CIL rate can be demonstrated as reasonable. The data sets relating to sale value used by PPE in the CIL evidence based rely upon 2014-2016 indexed data which has not been cross checked with any recent sales evidence to confirm the assumptions are accurate. Such data must be updated prior to the release of the next CIL draft charging schedule to ensure the evidence base is robust. The issue of up to date and accurate data is also applicable to constructions costs -including those for S106 items and site delivery. Furthermore a serious issue with the proposed cash-flow was identified in the example appraisal of SWB. The proposed cashflow assumes houses are sold on the same date that land is purchased, and the infrastructure works are undertaken; and construction of the properties commence! Effectively an unrealistic cashflow has been applied which results in the appraisal being more viable than is possible. This is because the appraisal assumes that scheme revenue is received before it would be possible to complete construction which is illogical. This flaw appears to go a long way to explain why the CIL proposed for Billericay is such an anomaly when compared to other proposed rates in Basildon, Essex or even the UK. Only CIL rates in zone one of central London are higher than that proposed for Billericay which is illogical. Please see Appendix 1 attached for further examination of the CIL.</p>
<a href="#">PDCS/86</a>	St Modwen Developments Ltd	St Modwen Developments Ltd	Mr James Iles	Planning Director Pro Vision	No comment.

ID	Full Name	Organisation Details	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/87</a>	Commercial Estates Group	Commercial Estates Group	Mr Hugh Lacey		<p>1 Representations – Residential Development (use class 3). The draft charging schedule identifies a range of different CIL rates for residential provision coming forward in different configurations and locations across the charging area. The consultation identifies seven principle questions which are to be answered ‘yes or no’ with the opportunity to provide additional commentary and evidence to support any answers. These representations focus only on question 6 namely ‘Is the rate of £350 per square metre for residential development in Billericay appropriate?’. In dealing with this question specific reference is made to the site allocations identified in the emerging plan under policy H19 Land East of Greens Farm Lane, Billericay. 1.1 The answer to the question seven outlined above is of ‘Is the rate of £350 per square metre for residential development in Billericay appropriate?’ is ‘no’ in respect of the site identified under Policy H19. The following paragraphs provide a summary of the rationale for this answer in respect of the H19 allocation and includes analysis of evidence set out by the Basildon Council – Local Plan and CIL Viability Study Update – Feb 2018 (‘The CIL Viability model’).</p> <p>1.2 The allocation proposes the delivery of up-to 400 homes across two connected parcels of land to the south of Billericay. Joining these parcels is an area of open space which includes site specific mitigation for open space (about 10Ha) and a further area (about 6.5ha) which will act as a further open space resource for the town which complements the existing area to the west of the site known as Mill Meadows Local Nature Reserve, which includes an SSSI. 1.3 The allocation will therefore be providing an additional open space resource of significant value to the local area as well as delivering much needed housing including a policy compliant level of affordable housing. 1.4 This package of planning obligations is challenging in the context of a CIL charge of £350 per sqm which will broadly equate to an average payment per market unit on the site likely to be above c.£25k. The CIL Viability Model considers a range of site typologies reported at table 5.1 on page 40. These can be broadly combined to produce a typology which broadly reflects the proposals for allocation H19. The table at 6.1 page 64 reports an indicative ‘pre CIL headroom’ of c. £1,000 per sqm across the ‘CIL liable floorspace’ i.e. the market housing element only on the site. Given the allocation will accommodate 31% affordable housing this equates to a headroom in total ‘pot’ terms of c.£21m (400x31%=276 average site c.75sqm gives c.21,000 sqm and CIL pot of 1,000 per sqm x 21,000). This implies a headroom post CIL of £650 per sqm or £13.65m across the market unit floorspace of c21k sqm. In turn this headroom or ‘buffer’ equates to about 185% or c. £35k per unit across the whole allocation of 400 homes. 1.5 The CIL Viability Model is underpinned by a range of inputs and assumptions across build, professional fees, finance, profit, planning obligations and value as well as judgements on land threshold. A majority of these are considered reasonable and are not therefore reviewed in this paper, however, the conclusions on planning obligations package, infrastructure costs and issues relating to the provision of open space are potentially overstating project viability and the effect is an erosion of ‘post CIL headroom’. Given these costs are considered on a tenure blind basis (i.e. the costs apply equally to market and affordable housing) it is important to measure them on a consistent basis. They are 2 therefore reviewed on a ‘per unit’ basis irrespective of tenure. The conclusions consider what this means when converted to a CIL levy as applied only to the market housing. 1.6 Dealing first with infrastructure costs and planning contributions. The model relies on a BCIS basis for the residential construction. This is an industry standard matrix which is a not unreasonable starting point for a model of this type. However, BCIS does not include any costs external to the buildings not does it include any sort of abnormalities such as unusual foundation design. On this basis all external works to a project including gardens, patios, plot services and drainage, parking, boundary walls, estate roads, landscaping, road improvements, site works, and utilities provision must all be added as an additional allowance normally applied as an uplift to BCIS. 1.7 The CIL Viability Model relies on two adjustments to factor in these costs firstly a single adjustment of c. 10% is added to the BCIS allowance and this equates to c.£9-10k per unit across a site. Whilst this sort of allowance may be sufficient for a simple development coming forward with limited external works it is unlikely to be sufficient to deal with the costs associated with a housing site especially where additional adjustments are not made to cover garage provision etc. An allowance of 15% would be more reasonable for a site as proposed by policy H19 and this adjustment would equate to c.£15k per unit or £5k above the allowance suggested by the CIL Viability Model. 1.8 The second adjustment is to add an allowance for ‘opening up costs’ to cover all the costs ‘off the housing plots’ such as site wide infrastructure including access</p>

ID	Full Name	Organisation Details	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CiL proposals for residential development here.
					<p>roads, pavements, lighting, structural landscaping, utilities and any offsite works to the road or drainage network. The CiL Viability Model relies on an adjustment of and no utilities complications it will not reflect the costs of bringing forward a development site of the scale envisaged by the policy H19 allocation. Typical allowances for these works on the larger sites lie in the £20-40k per plot range and this is generally consistent across large greenfield development proposals in England. 1.9 The commercial position on this site is currently at the mid-point of this range given the range of opening up costs, allowances for drainage and the reality that the allocation(s) involve the provision of at least two access points onto Greens Farm Lane. On this basis the opening up cost allowance relied upon by the CiL Viability Model is at least £20k per unit less than the current expectation. 1.10 The final element related to Section 106 allowance which are loaded into the model at between £8.5k and £15k per unit on the strategic sites and £3.25k on all other typologies. No breakdown is provided on the justification for the £3.25k per plot allowance save to identify this covers all S106 including health, open space, education, community provision and local highway and travel mitigation. The S106 burden on strategic sites would not normally be expected to exceed those of sites in the 300-400 units range by upwards of £5k per plot as the headline mitigation requirements will generally be broadly comparable. 1.11 Overall these three elements of the viability when combined deliver additional costs into the model of c. £30k per unit delivered. This equates to an overall cost of c. £12m and lies close to the identified CiL headroom of £13.65m identified above. 1.12 Additionally, the site allocated by draft policy H19 is being required to provide and fund c. 6.5ha 1 of open space over and above the level required to mitigate its own planning impacts. This has the <i>1 Total open space provision at c.16.5ha with site mitigation at c.10ha.</i> potential to fail the test identified at section 122 part 2c of the CiL Regulations 2010 by not being fairly and reasonably related in scale and kind to the development. There also remains a risk that this provision represents 'double dipping' if the expectation is for CiL to fund the provision of open space in the Council area on the basis the site would be contributing twice for the same provision. 1.13 The costs of this 'over provision' are not included in the CiL Viability Report because the threshold land value calculation is dealt with on a 'net developable' basis so sets aside the 'cost' of this 6.5ha area and the extensive landscaping costs expected to reach c.£1m are not factored into the model (as considered in the previous paragraphs). 1.14 Evidently removing the land (needed to provide the additional open space of 6.5ha) from its current agricultural use comes at a cost. Its base value is likely to be at least £30k per ha on a simple agricultural value basis. However, land in this location would routinely secure interest from other purchasers looking at small holdings or other equine related uses. This would attract a significant premium over the base agricultural value aside from any recognition that allocating this as open space would largely negate its potential of being developed. On this basis the land value of this 6.5ha parcel in conjunction with its provision costs is likely to exceed £1.5m. 1.15 This represents a further cost of c.£3.75k per unit across all units or a CiL equivalent of c.£70 per sqm across the likely chargeable floor space of the allocation proposed under draft policy H19. 1.16 The conclusion from this analysis is twofold. Firstly, whilst the development proposals remain 'viable' the level of CiL headroom or buffer is markedly reduced when the realistic costs of bringing forward the site are factored into the typology appraisals which underpin the CiL Viability Report. This is compounded by the unidentified costs associated with the over provision of open space by the draft allocation. 1.17 Whilst the erosion of a CiL buffer is not necessarily a precursor to viability issues which result in an adjustment to the level of affordable housing which can come forward the likelihood of this action is increased significantly. This alone would justify an adjustment to the CiL charging schedule in respect of the allocation under H19 to return a comfortable level of buffer and safeguard the provision of both affordable housing and S106 contributions as well as the requisite CiL payment. However, in conjunction with the concerns about the delivery of the open space breaching the provisions of Section 122 of the CiL regulations and its associated costs being managed by the development then an adjustment to the CiL charging schedule becomes imperative. 1.18 The additional costs associated with this site as identified above equate to above £30k per unit across all proposed 400 dwellings. This has the effect of eroding the buffer in the CiL Viability Model. It should be considered as potentially risky to almost entirely erode the CiL buffer for a scheme of this type and size as this could place pressure on the scheme where it is seeking to deliver the full package of S106 mitigation and AH. 1.19 Evidently given CiL</p>

ID	Full Name	Organisation Details	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
					<p>applies (assuming AH relief is secured in the normal way) to the market element of the allocation or c. 276 properties (400 units less 31% AH). The buffer considered appropriate by the CIL Viability Model to support the £350 per sqm CIL rate totalled c.£13.65m. This is eroded to c.£1.65m ignoring the costs associated with the additional open space provision and essentially nil when these are factored in. 1.20 Given the identified additional costs entirely erode the buffer, returning it to c.30% would require the scheme to be levied with c.70% of the currently proposed CIL charge and a 50% buffer puts the CIL rate to c.£175per sqm or 50% of the current rate. 1.21 Achieving a buffer of half of the previously identified total amount (of £13.65m) would require a CIL rate of c. £20 per sqm. Evidently setting a CIL rate is about striking a balance between deliverability of the scheme in question, the level of site specific mitigation through S106 and maintain or protecting the policy aspirations for affordable housing. The current charging schedule proposals when applied to allocation H19 suggest the rates are potentially undermining this balance due to the erosion of headroom. 1.22 Whilst the level of buffer is a matter for the charging authority to consider having regard to a range of factors including the types of schemes being modelled and the overall risk it is considered that a 30% buffer is reasonable minimum position for a scheme of this type and complexity.</p>

ID	Full Name	Organisation Details	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/88</a>	Mr John Smith	Planning Manager Gleeson Strategic Land	Mr James Brierley	Gerald Eve	<p>The CIL rate for Billericay is overestimated and unjustified by flawed evidence used to support it. The proposed rate does not sufficiently take into account appropriate costs required to deliver the site in accordance with other policies. The Billericay proposed CIL rate should be lowered to allow flexibility in meeting all other obligations and costs associated with delivering residential development - particularly relating to H17 - South West Billericay (SWB). Our assessment of the evidence base provided by Porter Planning Economics (PPE) to support the CIL rates specifically focused on land interests at SWB and noted several key issues which undermine the proposed CIL rate (as set out in Appendix 1 of this response). However, several issues identified within the evidence base relating to SWB appear to also be consistent across all the example appraisals provided. Therefore the evidence base supporting the residential CIL rates appears to be fundamentally flawed and cannot be relied upon to justify any of the proposed residential CIL rates. In Appendix 1 of this CIL response booklet we have set out detail of the issues with the PPE evidence base used to support the proposed CIL rates. However, we have summarised some of the key issues below: The proposed CIL relies upon evidence which is not available on the Council's website, resulting in the assessment lacking transparency. PPE indicate their work is a continuation of a PBA 2015 Report. However this PBA report does not appear to be available on the Basildon planning website or on the web page relating to the CIL. We were also unable to locate the Pell Frischmann's Basildon Borough HLDF Preliminary Abnormal Infrastructure report (2017) on which PPE have relied upon for several infrastructure costs relating to strategic sites. This lack of transparency inhibits reasonable interrogation of the evidence base. The CIL evidence base is inconsistent with the Draft Local Plan (DLP) (Oct 2018). In regard to SWB in the DLP, the evidence base wrongly identifies the site, tests the wrong level of homes to the DLP and is inconsistent in the applied assumptions to those set out in the PPE study - which in any event are questionable and out of date. Furthermore, the evidence base for Billericay is only supported by a single typology test in the example appraisals. Given that the Billericay example appraisal uses inconsistent assumptions to that set out in the PPE Study text, all of the appraisals undertaken in the study must be made available to the public for scrutiny before the CIL rate can be demonstrated as reasonable. The data sets relating to sale value used by PPE in the CIL evidence based rely upon 2014-2016 indexed data which has not been cross checked with any recent sales evidence to confirm the assumptions are accurate. Such data must be updated prior to the release of the next CIL draft charging schedule to ensure the evidence base is robust. The issue of up to date and accurate data is also applicable to constructions costs -including those for S106 items and site delivery. Furthermore a serious issue with the proposed cash-flow was identified in the example appraisal of SWB. The proposed cashflow assumes houses are sold on the same date that land is purchased, and the infrastructure works are undertaken; and construction of the properties commence! Effectively an unrealistic cashflow has been applied which results in the appraisal being more viable than is possible. This is because the appraisal assumes that scheme revenue is received before it would be possible to complete construction which is illogical. This flaw appears to go a long way to explain why the CIL proposed for Billericay is such an anomaly when compared to other proposed rates in Basildon, Essex or even the UK. Only CIL rates in zone one of central London are higher than that proposed for Billericay which is illogical. Please see Appendix 1 attached for further examination of the CIL.</p>

ID	Full Name	Organisation Details	Full Name	Organisation Details	Residential comment - Please provide any comments in relation to the CIL proposals for residential development here.
<a href="#">PDCS/89</a>	Sarah Kirk	Redrow Homes Ltd	Mr James Brierley	Gerald Eve	<p>The proposed CIL relies upon evidence which is not available on the Council's website, resulting in the assessment lacking transparency. PPE indicate their work is a continuation of a PBA 2015 Report. However this PBA report does not appear to be available on the Basildon planning website or on the web page relating to the CIL. We were also unable to locate the Pell Frischmann's Basildon Borough HLDF Preliminary Abnormal Infrastructure report (2017) on which PPE have relied upon for several infrastructure costs relating to strategic sites. This lack of transparency inhibits reasonable interrogation of the evidence base. The CIL evidence base is inconsistent with the Draft Local Plan (DLP) (Oct 2018). In regard to SWB in the DLP, the evidence base wrongly identifies the site, tests the wrong level of homes to the DLP and is inconsistent in the applied assumptions to those set out in the PPE study - which in any event are questionable and out of date. The CIL evidence base is inconsistent with the Draft Local Plan (DLP) (Oct 2018). In regard to SWB in the DLP, the evidence base wrongly identifies the site, tests the wrong level of homes to the DLP and is inconsistent in the applied assumptions to those set out in the PPE study - which in any event are questionable and out of date. Furthermore, the evidence base for Billericay is only supported by a single typology test in the example appraisals. Given that the Billericay example appraisal uses inconsistent assumptions to that set out in the PPE Study text, all of the appraisals undertaken in the study must be made available to the public for scrutiny before the CIL rate can be demonstrated as reasonable. The data sets relating to sale value used by PPE in the CIL evidence based rely upon 2014-2016 indexed data which has not been cross checked with any recent sales evidence to confirm the assumptions are accurate. Such data must be updated prior to the release of the next CIL draft charging schedule to ensure the evidence base is robust. The issue of up to date and accurate data is also applicable to constructions costs -including those for S106 items and site delivery. Furthermore a serious issue with the proposed cash-flow was identified in the example appraisal of SWB. The proposed cashflow assumes houses are sold on the same date that land is purchased, and the infrastructure works are undertaken; and construction of the properties commence! Effectively an unrealistic cashflow has been applied which results in the appraisal being more viable than is possible. This is because the appraisal assumes that scheme revenue is received before it would be possible to complete construction which is illogical. This flaw appears to go a long way to explain why the CIL proposed for Billericay is such an anomaly when compared to other proposed rates in Basildon, Essex or even the UK. Only CIL rates in zone one of central London are higher than that proposed for Billericay which is illogical. Please see Appendix 1 attached for further examination of the CIL.</p>
<a href="#">PDCS/92</a>	Janice Burgess	Highway England			
<a href="#">PDCS/93</a>	Liz Harris-Best	Chelmsford City Council			

Appendix D (2): Organisations Schedule of Respondents and Comments on all other CIL Rates

ID	Full Name	Organisation Details	Full Name	Organisation Details	Retail comments	Retirement comments	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/21</a>	Mrs Debbie Mack	Historic Environment Planning Adviser Historic England							<p><b>Basildon Borough Council CIL Preliminary Draft Charging Schedule Oct 2018</b> Thank you for providing Historic England with an opportunity to comment on the review of the CIL, an important source of funding for the infrastructure required to underpin the delivery sustainable development in the Borough. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. <b>Funding infrastructure</b> There is a wide definition of CIL in terms of what may be required. The Localism Act allows CIL to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces and public places. Historic England therefore encourages charging authorities to consider identifying the ways in which CIL, and S106 agreements can be used to implement Local Plan policy and proposals relating to the conservation of the historic environment, heritage assets and their setting. This will help to satisfy national planning policy (NPPF paragraphs 8, 20 and 185). It is now well established that heritage is not an adjunct to a healthy economy, an important component of growth and a source of employment. Consequently Historic England suggests reference in the Regulation 123 list to '<i>Our Streets and Spaces public realm projects</i>' as the type of infrastructure that CIL will be spent on. Without</p>	

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									<p>prejudice to the above, development specific planning obligations and S106 will continue to offer opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets. You may wish to clarify this matter in your schedule. <b>Discretionary Relief for Exceptional Circumstances</b> The Regulations emphasise the need to strike an appropriate balance between the opportunities of funding infrastructure from the levy and the potential effects that may arise through increased pressure on the economic viability of development. For example, there could be circumstances where the viability of a scheme designed to secure the reuse and long term viability of a heritage asset is compromised by the requirement for CIL payments. Vacant or underused heritage assets not only fail to make a full contribution to the Borough's economy but they also give rise to negative perceptions about an area. This, in turn, can detract from its attractiveness to visitors and inward investment. Consequently, in setting thresholds there needs to be a clear understanding of the potential impact which CIL could have on investment in, and regeneration of, historic areas - particularly those which have been identified as being 'at risk'. We are therefore encouraging local authorities to assert their right to apply discretionary relief for exceptional circumstances; where development which affects heritage assets and their settings and/or their significance, may become unviable if it was subject to CIL. Paragraph 185 of the NPPF requires that local authorities set out in their Local</p>	

ID	Full Name	Organisation Details	Full Name	Organisation Details	Retail comments	Retirement comments	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
									<p>Plan, a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In relation to CIL, this means ensuring that the conservation of its heritage assets is taken into account when considering the level of the CIL to be imposed so as to safeguard and encourage appropriate and viable uses for the historic environment. The <i>CIL Relief Information Document</i> recommends that the conditions and procedures for CIL relief are set out in a separate statement, defining exceptional circumstances and setting a clear rationale for their use and justification in terms of the public benefit. In this case an example could be where CIL relief would enable the restoration of heritage assets as identified on Historic England's 'Heritage at Risk Register'. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. If there any issues you wish to clarify or discuss please don't hesitate in contacting me.</p>	

ID	Full Name	Organisation Details	Full Name	Organisation Details	Retail comments	Retirement comments	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
PDCS/25	Mr Roy Warren	Planning Manager Sport England					<p>An objection is made to the proposal for 'all other uses' to be charged a £10 per square metre CIL rate as it has been assumed that this will include sport and leisure uses. As set out on page 7 of Sport England's established Forward Planning guidance <a href="https://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">https://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a> in order to promote investment in sport and ensure sporting development is viable, CIL charging schedules should have a nil rate for sport and recreation uses. The majority of local planning authorities (including all other authorities in Essex) that have undertaken CIL viability assessments have concluded that the value and cost of sports facilities is finely balanced and the introduction of a levy could deter development which would meet community needs. The majority of conventional sports facilities such as swimming pools, sports halls, sports clubhouses etc depend on public or voluntary sector funding to make the development of new facilities viable and the current significant restraints on public and voluntary sector expenditure have exacerbated the situation. In the small number of authorities across the country that have not made sports facilities exempt from CIL there have been unintended consequences of either delaying or in some cases preventing the delivery of community sports facilities because of the charges. This has particularly affected sports</p>	<p>To address this objection, it is requested that the CIL rates in the charging schedule are amended to specifically exclude sport and leisure uses from the 'All other uses' that would be liable for the £10 per sq/m CIL rate.</p>	<p>The inclusion of open space/outdoor sport in the IDP which supports the CIL preliminary charging schedule is welcomed as the need to provide for outdoor sport through new development is justified by the Council's evidence base. However, the next time the IDP is reviewed, it should be updated to account for the Council's recently approved Playing Pitch Strategy and Built Facilities Strategy which provide the most up-to-date evidence base for justifying development making provision for sport. In particular, the IDP should adopt the recommendations in these strategies relating to the approach to calculating developer contributions as these differ to the standards based approach set out in the current IDP which was prepared before the strategies were completed and approved. The actions plans in the two strategies should be refined in consultation with stakeholders to identify a shorter list of priority indoor and outdoor sports facility projects in Basildon district that CIL receipts and section 106 contributions should be used towards.</p>	

ID	Full Name	Organisation Details	Full Name	Organisation Details	Retail comments	Retirement comments	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
							<p><a href="#">clubs in relation to new or replacement sports pavilions which have been dependent on club fundraising and external grants. It has also affected local authority leisure centres. Of particular concern is that the proposal to apply a £10 per square metre CIL rate to uses other than retail and residential does not appear to be justified by the Council's 'Basildon Local Plan and CIL Viability Update Study (February 2018) which concludes in the recommendations in table 7.1 (based on the preceding assessment of viability) that all other forms of residential floorspace should be charged a zero rate. Furthermore, the study does not appear to have specifically assessed sport/recreation uses to assess their viability for CIL charging to justify a proposed £10 per sq.m charge. It is therefore unclear what the Council's evidence base is for applying the rates to such uses, especially since the study showed that other non-residential uses such as business and hotel uses which are more commercially viable than sports facilities would have a negative CIL liable headroom.</a></p>			
<a href="#">PDCS/42</a>	Richard Carr	Transport for London (TfL)			Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the CIL Preliminary Draft Charging Schedule	Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the CIL Preliminary Draft Charging Schedule	Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the CIL Preliminary Draft Charging Schedule	Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the CIL Preliminary Draft Charging Schedule	Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the CIL Preliminary Draft Charging Schedule	

ID	Full Name	Organisation Details	Full Name	Organisation Details	Retail comments	Retirement comments	CIL for other types of development	Proposed Changes to CIL	Priorities for CIL	General Comments
<a href="#">PDCS/61</a>	Martin Grant Homes	Martin Grant Homes	Steve Smith	Turley Development Viability						
<a href="#">PDCS/71</a>	Miss Anna Davies	Taylor Wimpey	Mr James Brierley	Gerald Eve	We have not looked to challenge retail, but we would expect this rate to be reviewed as part of any evidence update as part of the further stages of the CIL charging process. Please see Appendix 1 attached for further examination of the CIL.	The definition of what constitutes retirement property is ambiguous and does not clearly define what would be classed as retirement housing and that which would be seen as standard residential housing. This could lead to disagreements as to what CIL rate is deemed appropriate for a particular housing development. The definition provided by Porter Planning Economics (PPE) in their Basildon Local Plan and CIL Viability Update Study (Feb 2018) describes retirement housing as "sheltered housing, flats, bungalows, self contained homes". This is in itself ambiguous and covers a wide range of potential development opportunities, which could also be considered standard housing. For example Flats in Basildon would have a CIL of £50 psqm, £350 psqm in Billericay and £100 psqm if they are deemed as retirement. It is not clear for a	Any proposed CIL rate must be based on robust evidence. Simply applying a CIL rate without testing it appropriately could make other development types unviable. The NPPF states that the cumulative effect of policy should not undermine the delivery of development. Apply such a CIL rate without testing is contrary to this requirement. Please see Appendix 1 attached for further examination of the CIL.	Rates must be based on appropriate and relevant evidence - land use is not the only element which determines viability. Therefore, this is not an appropriate method for testing CIL and could lead to the cumulative effect of policy making development undeliverable. Please see Appendix 1 attached for further examination of the CIL.	In particular of strategic sites, there needs to be clear identification of which infrastructure provision will be deemed S106 costs and those which may be supported by CIL. 5.39 of the PPE February 2018 CIL viability Study states that: "On greenfield sites there is a need to allow for opening costs such as site service installations and strategic infrastructure such as drainage, strategic landscaping, and public open space etc. Since some strategic infrastructure may be paid for separately through CIL or S106/278 charges, the assumptions of table 5.9 are applied on the number of units per scheme to identify the scheme of site infrastructure." It is clear from this that even PPE were unsure in their assessment as to what infrastructure projects would be supported by CIL and which would be site specific obligations. It is important therefore to ensure that the costs associated with site specific obligations are appropriately identified and sufficient allowance is made in the CIL rate for these to be viably delivered over the life time of the plan. If on site infrastructure is anticipated to be supported by CIL funding, it is important to identify such infrastructure items and the cost reliance on CIL for their delivery. However, given the 123 list can be amended at any time, it is imperative to avoid provisions being double counted, missed altogether or making a development unviable that strategic development does not rely upon CIL contributions to be deliverable. Therefore, it is proposed that irrespective of the anticipated support CIL contributions will provide, the CIL rate for strategic development	

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						<p>developer how to, therefore, approach anticipated CIL costs for flats and when they would be accepted as retirement. Furthermore, no appraisal has been presented to demonstrate the outcome of the assumptions provided within the PPE study. As such, it is not possible to confirm that £100per sq m is appropriate and under what circumstances this would be reasonable. The Council must provide full and transparent testing of any CIL rate to justify all proposed rates. Please see Appendix 1 attached for further examination of the CIL.</p>			<p>should be set at a sufficiently lower level when compared to general development, to ensure that such schemes come forward viably. Please see Appendix 1 attached for further examination of the CIL.</p>	
<a href="#">PDCS/76</a>	Miss Paige Harris	Planner Persimmon Homes						Please see attached representations by Persimmon Homes.	Please see attached representations by Persimmon Homes.	
<a href="#">PDCS/80</a>	Countryside Properties (UK) Ltd	Countryside Properties (UK) Ltd	Mr Kevin Coleman	Director Phase 2 Planning & Development					As per our response to question 6, any shortfall in funding for the relocation of the Gardiners Lane sports pitches should be met through CIL funding.	
<a href="#">PDCS/81</a>		Gleeson Homes and Gladedale	Mr Kevin Coleman	Director Phase 2 Planning & Development						

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<a href="#">PDCS/82</a>		Pigeon (Wickford) Ltd	Mr Richard Clews		N/A	N/A	N/A	N/A	N/A	
<a href="#">PDCS/83</a>		Estate and Agency Strategic Land LLP	Mr Luke Challenger	Associate ICENI Projects						
<a href="#">PDCS/84</a>		BDW Eastern Counties	Mrs Lauren Patel	Barton Willmore LLP						
<a href="#">PDCS/85</a>	Scott Properties	Scott Properties			We have not looked to challenge retail, but we would expect this rate to be reviewed as part of any evidence update as part of the further stages of the CIL charging process. Please see Appendix 1 attached for further examination of the CIL.	The definition of what constitutes retirement property is ambiguous and does not clearly define what would be classed as retirement housing and that which would be seen as standard residential housing. This could lead to disagreements as to what CIL rate is deemed appropriate for a particular housing development. The definition provided by Porter Planning Economics (PPE) in their Basildon Local Plan and CIL Viability Update Study (Feb 2018) describes retirement housing as "sheltered housing, flats, bungalows, self contained homes". This is in itself ambiguous and covers a wide range of potential development opportunities, which could also be considered standard housing. For example Flats in Basildon would	Any proposed CIL rate must be based on robust evidence. Simply applying a CIL rate without testing it appropriately could make other development types unviable. The NPPF states that the cumulative effect of policy should not undermine the delivery of development. Apply such a CIL rate without testing is contrary to this requirement. Please see Appendix 1 attached for further examination of the CIL.	Rates must be based on appropriate and relevant evidence - land use is not the only element which determines viability. Therefore, this is not an appropriate method for testing CIL and could lead to the cumulative effect of policy making development undeliverable. Please see Appendix 1 attached for further examination of the CIL.	n particular of strategic sites, there needs to be clear identification of which infrastructure provision will be deemed S106 costs and those which may be supported by CIL. 5.39 of the PPE February 2018 CIL viability Study states that: "On greenfield sites there is a need to allow for opening costs such as site service installations and strategic infrastructure such as drainage, strategic landscaping, and public open space etc. Since some strategic infrastructure may be paid for separately through CIL or S106/278 charges, the assumptions of table 5.9 are applied on the number of units per scheme to identify the scheme of site infrastructure." It is clear from this that even PPE were unsure in their assessment as to what infrastructure projects would be supported by CIL and which would be site specific obligations. It is important therefore to ensure that the costs associated with site specific obligations are appropriately identified and sufficient allowance is made in the CIL rate for these to be viably delivered over the life time of the plan. If on site infrastructure is anticipated to be supported by CIL funding, it is important to identify such infrastructure items and the cost reliance on CIL for their delivery. However, given the 123 list can be amended at any time, it is imperative to avoid provisions being double counted, missed altogether or making a development unviable that	

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<a href="#">PDCS/86</a>	St Modwen Developments Ltd	St Modwen Developments Ltd	Mr James Iles	Planning Director Pro Vision	No comment	No comment	St Modwen has an interest in, and is promoting, land identified in the Publication Local Plan under Policy E6: Burnt Mills Extension. The proposed “nominal CIL charge” for all other types of development is not justified by the evidence base and therefore fails the tests of soundness. The CIL Viability Update Study (February 2018) states that “All other forms of non-residential floorspace” should be £0 rated (paragraph 6.25 and Table 7.1). This is based on the evidence presented in Table 6.5 for non-residential sites, which clearly demonstrates negative headroom values for non-residential uses other than retail uses. The Council has not provided additional evidence to justify departing from this clear recommendation for non-residential floorspace. In the context of negative headroom values, especially for business park and industrial/warehouse uses (-£200 and -£598) respectively, delivery of the strategic employment site allocation at Burnt Mills (policy E6) may be threatened with any CIL charge. This site allocation will be required to deliver key infrastructure itself, including a new link road to the A127, therefore even a “nominal” charge could have significant implications for development viability.			
<a href="#">PDCS/87</a>	Commercial Estates Group	Commercial Estates Group	Mr Hugh Lacey							

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<a href="#">PDCS/88</a>	Mr John Smith	Planning Manager Gleeson Strategic Land	Mr James Brierley	Gerald Eve	We have not looked to challenge retail, but we would expect this rate to be reviewed as part of any evidence update as part of the further stages of the CIL charging process. Please see Appendix 1 attached for further examination of the CIL.	The definition of what constitutes retirement property is ambiguous and does not clearly define what would be classed as retirement housing and that which would be seen as standard residential housing. This could lead to disagreements as to what CIL rate is deemed appropriate for a particular housing development. The definition provided by Porter Planning Economics (PPE) in their Basildon Local Plan and CIL Viability Update Study (Feb 2018) describes retirement housing as "sheltered housing, flats, bungalows, self contained homes". This is in itself ambiguous and covers a wide range of potential development opportunities, which could also be considered standard housing. For example Flats in Basildon would have a CIL of £50 psqm, £350 psqm in Billericay and £100 psqm if they are deemed as retirement. It is not clear for a developer how to, therefore, approach anticipated CIL costs for flats and	Any proposed CIL rate must be based on robust evidence. Simply applying a CIL rate without testing it appropriately could make other development types unviable. The NPPF states that the cumulative effect of policy should not undermine the delivery of development. Apply such a CIL rate without testing is contrary to this requirement. Please see Appendix 1 attached for further examination of the CIL.	Rates must be based on appropriate and relevant evidence - land use is not the only element which determines viability. Therefore, this is not an appropriate method for testing CIL and could lead to the cumulative effect of policy making development undeliverable. Please see Appendix 1 attached for further examination of the CIL.	n particular of strategic sites, there needs to be clear identification of which infrastructure provision will be deemed S106 costs and those which may be supported by CIL. 5.39 of the PPE February 2018 CIL viability Study states that: "On greenfield sites there is a need to allow for opening costs such as site service installations and strategic infrastructure such as drainage, strategic landscaping, and public open space etc. Since some strategic infrastructure may be paid for separately through CIL or S106/278 charges, the assumptions of table 5.9 are applied on the number of units per scheme to identify the scheme of site infrastructure." It is clear from this that even PPE were unsure in their assessment as to what infrastructure projects would be supported by CIL and which would be site specific obligations. It is important therefore to ensure that the costs associated with site specific obligations are appropriately identified and sufficient allowance is made in the CIL rate for these to be viably delivered over the life time of the plan. If on site infrastructure is anticipated to be supported by CIL funding, it is important to identify such infrastructure items and the cost reliance on CIL for their delivery. However, given the 123 list can be amended at any time, it is imperative to avoid provisions being double counted, missed altogether or making a development unviable that strategic development does not rely upon CIL contributions to be deliverable. Therefore, it is proposed that irrespective of the anticipated support CIL contributions will provide, the CIL rate for strategic development should be set at a sufficiently lower level when compared to general development, to ensure that such schemes come forward viably. Please see Appendix 1	

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<a href="#">PDCS/89</a>	Sarah Kirk	Redrow Homes Ltd	Mr James Brierley	Gerald Eve	We have not looked to challenge retail, but we would expect this rate to be reviewed as part of any evidence update as part of the further stages of the CIL charging process. Please see Appendix 1 attached for further examination of the CIL.	The definition of what constitutes retirement property is ambiguous and does not clearly define what would be classed as retirement housing and that which would be seen as standard residential housing. This could lead to disagreements as to what CIL rate is deemed appropriate for a particular housing development. The definition provided by Porter Planning Economics (PPE) in their Basildon Local Plan and CIL Viability Update Study (Feb 2018) describes retirement housing as "sheltered housing, flats, bungalows, self contained homes". This is in itself ambiguous and covers a wide range of potential development opportunities, which could also be considered standard housing. For example Flats in Basildon would have a CIL of £50 psqm, £350 psqm in Billericay and £100 psqm if they are deemed as retirement. It is not clear for a developer how to, therefore, approach anticipated CIL costs for flats and	Any proposed CIL rate must be based on robust evidence. Simply applying a CIL rate without testing it appropriately could make other development types unviable. The NPPF states that the cumulative effect of policy should not undermine the delivery of development. Apply such a CIL rate without testing is contrary to this requirement. Please see Appendix 1 attached for further examination of the CIL.	Rates must be based on appropriate and relevant evidence - land use is not the only element which determines viability. Therefore, this is not an appropriate method for testing CIL and could lead to the cumulative effect of policy making development undeliverable. Please see Appendix 1 attached for further examination of the CIL.	In particular of strategic sites, there needs to be clear identification of which infrastructure provision will be deemed S106 costs and those which may be supported by CIL. 5.39 of the PPE February 2018 CIL viability Study states that: "On greenfield sites there is a need to allow for opening costs such as site service installations and strategic infrastructure such as drainage, strategic landscaping, and public open space etc. Since some strategic infrastructure may be paid for separately through CIL or S106/278 charges, the assumptions of table 5.9 are applied on the number of units per scheme to identify the scheme of site infrastructure." It is clear from this that even PPE were unsure in their assessment as to what infrastructure projects would be supported by CIL and which would be site specific obligations. In particular of strategic sites, there needs to be clear identification of which infrastructure provision will be deemed S106 costs and those which may be supported by CIL. 5.39 of the PPE February 2018 CIL viability Study states that: "On greenfield sites there is a need to allow for opening costs such as site service installations and strategic infrastructure such as drainage, strategic landscaping, and public open space etc. Since some strategic infrastructure may be paid for separately through CIL or S106/278 charges, the assumptions of table 5.9 are applied on the number of units per scheme to identify the scheme of site infrastructure." It is clear from this that even PPE were unsure in their assessment as to what infrastructure projects would be supported by CIL and which would be site specific obligations. viably. Please see Appendix 1 attached for further examination of the CIL.	

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						<p>when they would be accepted as retirement. Furthermore, no appraisal has been presented to demonstrate the outcome of the assumptions provided within the PPE study. As such, it is not possible to confirm that £100per sq m is appropriate and under what circumstances this would be reasonable. The Council must provide full and transparent testing of any CIL rate to justify all proposed rates. Please see Appendix 1 attached for further examination of the CIL.</p>				

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<a href="#">PDCS/92</a>	Janice Burgess	Highway England								<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN. In spatial</p>

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										<p>planning and development control terms, we have a duty to safeguard the operation of the SRN as set out in the DfT Circular 02/2013 (The Strategic Road Network and the Delivery of Sustainable Development). The circular encourages Highways England to work co-operatively with Local Planning Authorities within the framework of the Government's policies for planning, growth areas, regeneration, integrated transport and sustainability. In the case of the Basildon borough, although there is no SRN directly within the borough, it should be noted that the A13, A127, A1089 and M25 in particular Junctions 28,29 and 30 are located to the north and west of the area respectively. These roads</p>

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										<p>are heavily congested and any material increase in traffic on these sections of the SRN would be a concern to Highways England. It is clear to us from the Local Plan document and the transport evidence base provided that the overall development in Basildon may have an impact on the SRN. It seems that the impact on the SRN has not been assessed to date. Therefore, the potential impact of the Local Plan on the SRN should be assessed to provide evidence to Highways England of the impact that the Local Plan development could have on the SRN. Moreover, in accordance with DCLG guidance, any development contributions towards SRN improvements would be secured via S278</p>

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										<p>agreements, and not via a CIL Reg123 List or S106. The use of S278s will enable multiple sites to contribute, if appropriate, and also secures the Secretary of State's position by ensuring that 100% of contributions go towards the SRN improvement. However, in some cases, it could be more expedient for Highways England to be party to the S106 and secure mitigation through obligations. Bearing in mind these comments we don't have anything more specific to say about the consultation regarding the CIL 123 Register. We suggest that a meeting should be arranged to further discuss the comments above. In conclusion, at this time we are unable to make an informed decision as to the soundness</p>

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										<p>of the plan due to lack of evidence concerning the impact the Local Plan will have on the SRN. I trust that the above comments are of assistance to you and look forward to your response concerning further discussions and the impact of the Local Plan on the SRN.</p>
<a href="#">PDCS/93</a>	Liz Harris-Best	Chelmsford City Council			<p>On behalf of Chelmsford City Council, I would like to thank you for giving us the opportunity to comment on Basildon's CIL Preliminary Draft Charging Schedule. We note your evidence base for implementing the charge and support your endeavours to implement a charge. We</p>					<p>On behalf of Chelmsford City Council, I would like to thank you for giving us the opportunity to comment on Basildon's CIL Preliminary Draft Charging Schedule. We note your evidence base for implementing the charge and support your endeavours to implement a charge. We</p>

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					have no further comments to make.					have no further comments to make.

